

EXHIBIT A

[Redacted]

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KAELI GARNER, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No.
)	
AMAZON.COM, INC., a Delaware)	2:21-cv-00750-RSL
Corporation, and AMAZON.COM)	
SERVICES LLC, a Delaware)	
Limited Liability Company,)	
)	
Defendants.)	
)	
)	

- CONDUCTED BY VIDEOCONFERENCE -

16:04 Coordinated Universal Time

Michelle Keegan, RMR, CRR, CSR

1 speech recognition, which is the team I am on.

2 We transcribe speech to text. And then
3 that goes to a component called "natural language
4 understanding," which then tries to deduce what
5 the customer meant to ask for.

6 And then it goes to what I would say is
7 the fourth component, which is actually many other
8 components underlying, but we call them
9 "speechlets," which is just the service that
10 renders the response back.

11 So if you ask "What's the weather?" the
12 speechlet is the one that will say, "Okay, this
13 person wants the weather in Seattle, so I'm going
14 to go fetch that information and return it."

15 And then I guess lastly there is a
16 component called "text to speech," which is
17 generating Alexa's response, the voice.

18 Q. And where does that happen?

19 A. When does what happen?

20 Q. Not when. Where?

21 A. Which part?

22 Q. The text to speech.

23 A. I don't know.

24 Q. Let's talk about the speech recognition
25 for a second. So where does that occur?

1 A. Where does that occur?

2 Q. Yes.

3 A. What do you mean?

4 Q. Does it occur on the device?

5 A. We do have a feature where we process some
6 speech recognition on-device, but the majority of
7 it occurs on the cloud.

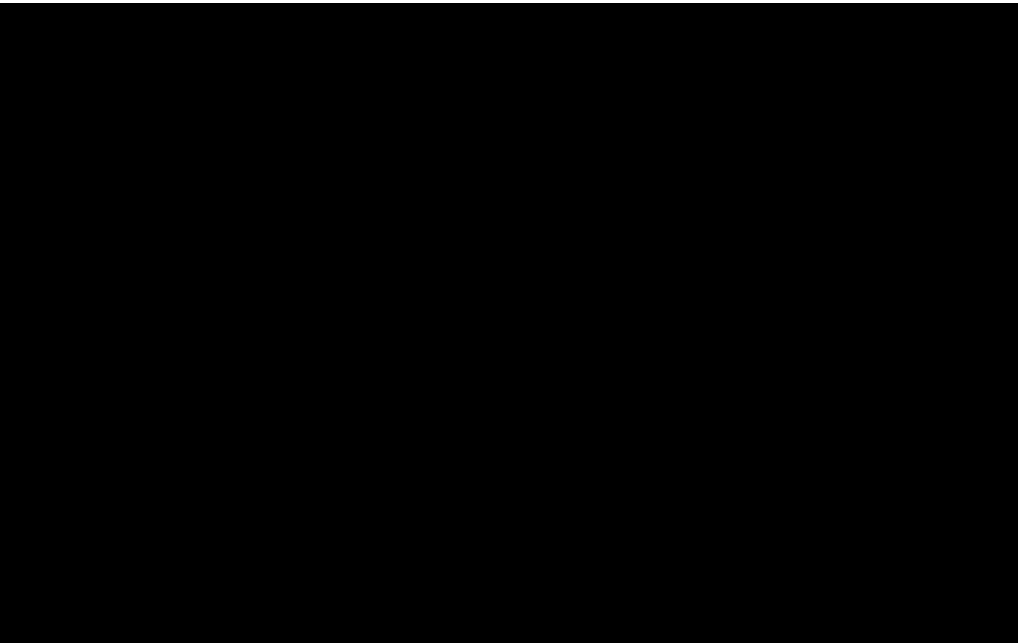
8 Q. And what is the function that does it on
9 the device?

10 A. There is a feature that customers can
11 select that is called "do not send voice
12 recordings," which is a feature that sets speech
13 recognition, parts of it, to occur on the device.

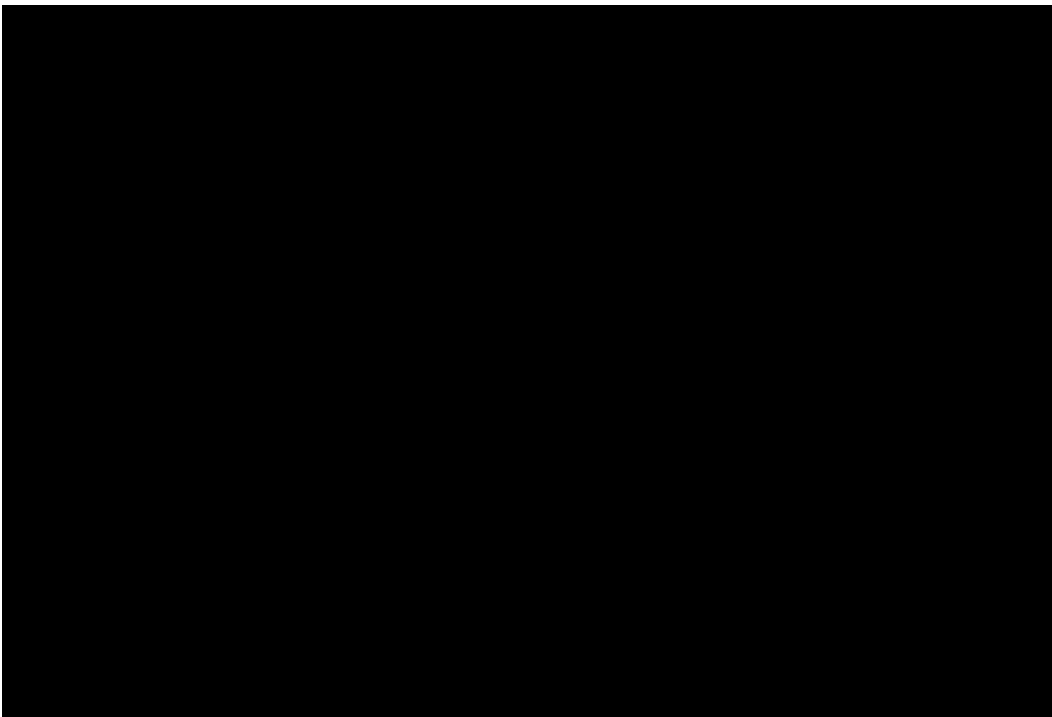
14 Q. And that is something that a customer has
15 to specifically select. Correct?

16 A. Yes.

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Q. When does that occur?

A. So when the customer is making the request, we call that "at run time." So as they're doing it, our machine learning models are transcribing that real time to text.

Q. If a customer opts out of having their audio stored, is there still a transcribed -- is there still a transcription of the text that goes to the cloud?

A. I have -- so if the customer opts out of having their -- let me -- so -- let me speak to the "do not send voice recordings."

There's a bunch of different features, so I have to be specific about the feature itself.

And so if a customer selects the feature

1 that I spoke about, "do not send voice
2 recordings," there is still a text transcript that
3 goes to the cloud and is available to the customer
4 to see in their voice history.

5 Q. Are you familiar with the difference
6 between analog and digital?

7 Did I lose you, Angela?

8 A. Can you hear me?

9 Q. Now I hear you. Yeah.

10 Are you familiar with those terms?

11 A. Yes.

12 Q. Do the Alexa devices convert analog to
13 digital?

14 A. Can you hear me?

15 Q. I missed you, if you said something. I'm
16 so sorry.

17 A. Yes.

18 Q. How does that happen?

19 A. Yeah. So, you know, to us, or at least in
20 my interpretation, the voice -- the human voice
21 and humans themselves are in the analog world.
22 And as they speak to Alexa, we then translate that
23 request, the voice request, into the digital form
24 which are these text transcripts.

25 Q. The software does that. Correct?

1 A. Yes.

2 Q. And what --

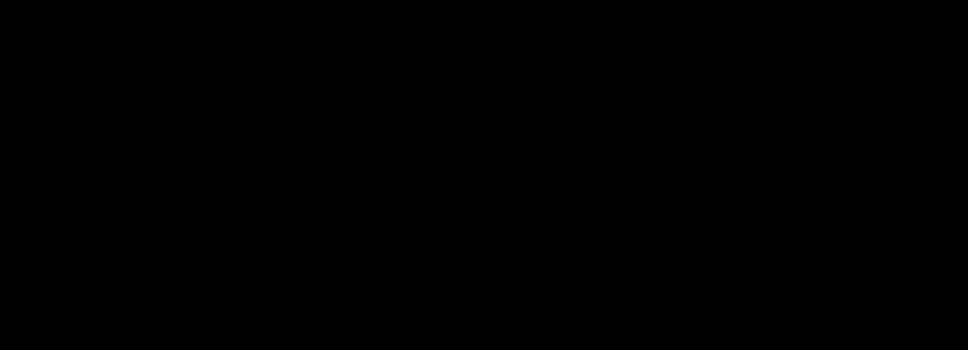
3 A. My word for it is our machine learning
4 models do that. Yes.

5 Q. And where does that process occur? Is
6 that in the cloud?

7 MR. NEWBY: Objection to form.

8 Q. Where does that process occur? I'm sorry.

9 A. So I mentioned, most of the time it is on
10 the cloud unless the customers have elected to --
11 the speech, where we talked about "do not send
12 voice recordings" for that audio processing to
13 happen on-device.

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19 Q. And when you say it's processed on the
20 device, you mean on the Alexa device?

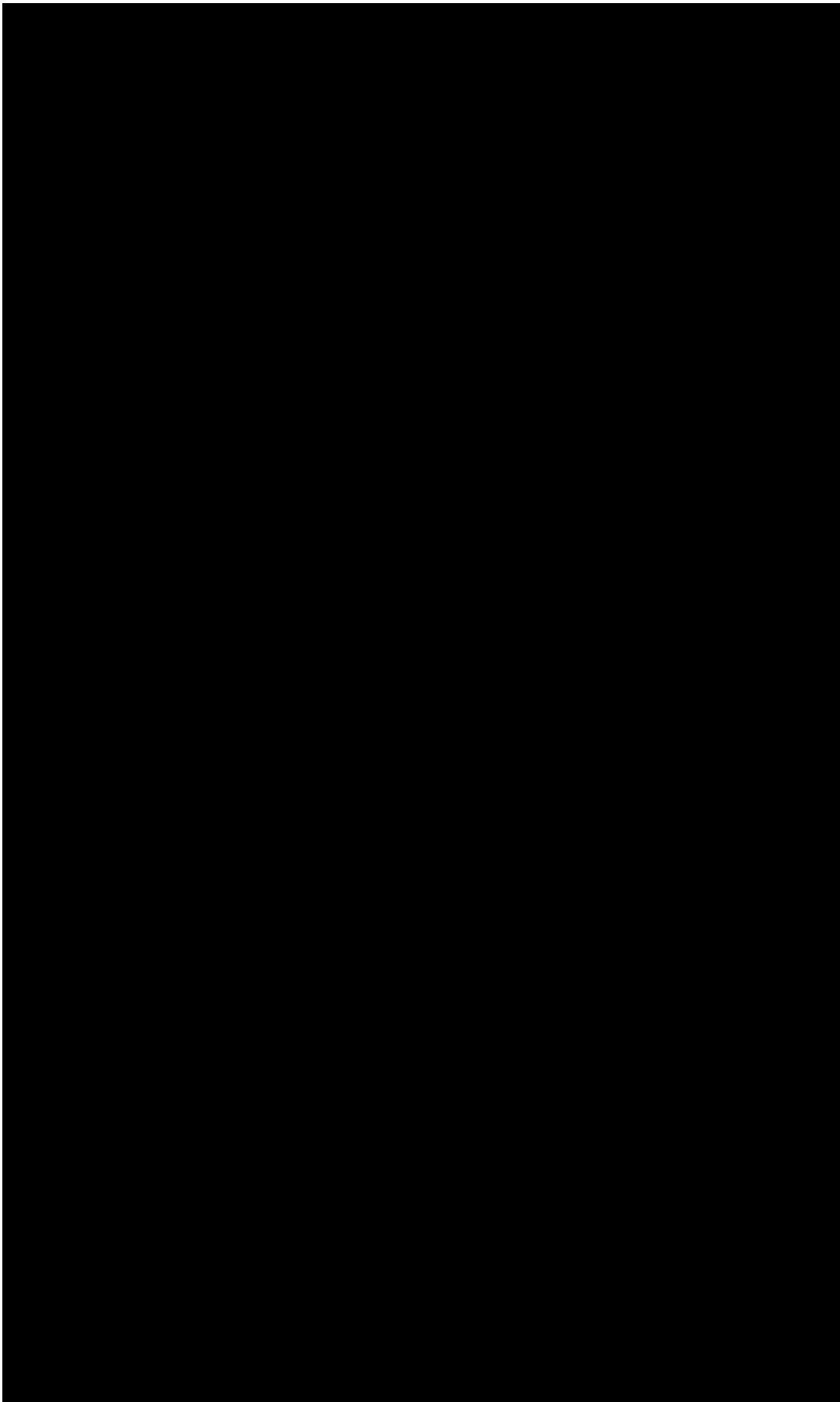
21 A. Yes. The Echo devices.

22 Q. Okay. Are you familiar with whether or
23 not the Alexa devices receive data from Amazon?

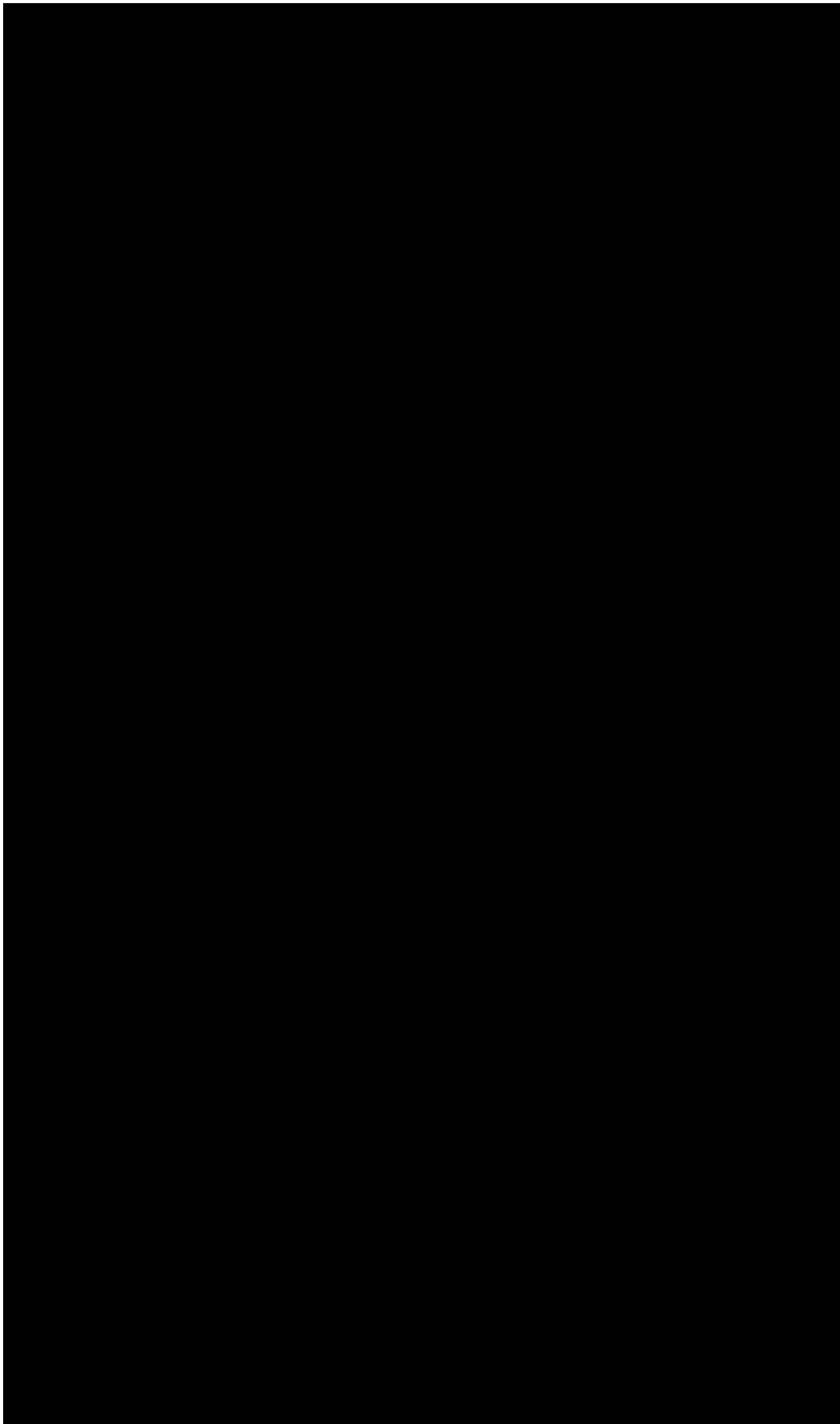
24 MR. NEWBY: Objection to form.

25 A. I am -- you mean -- can you be more

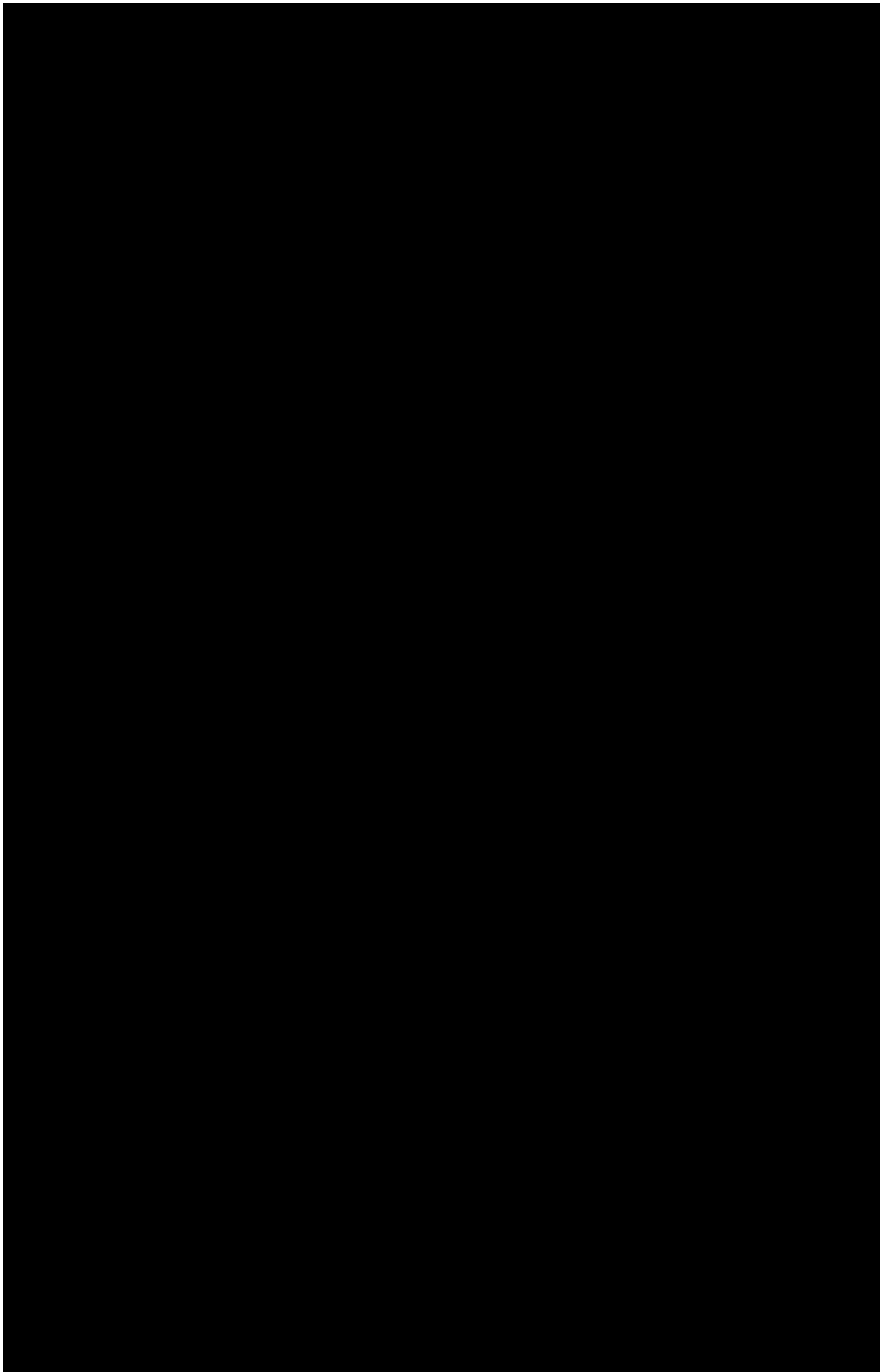
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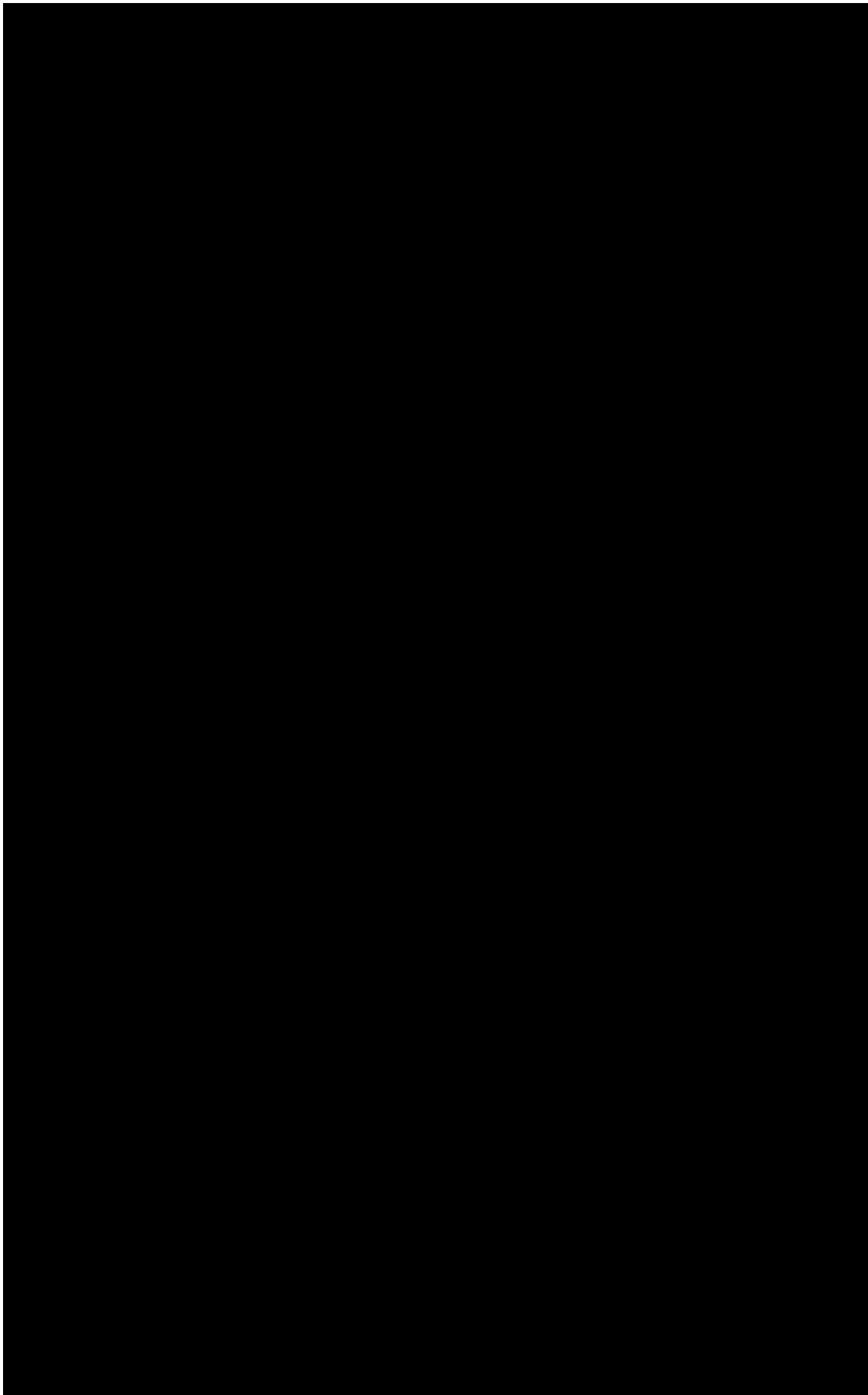
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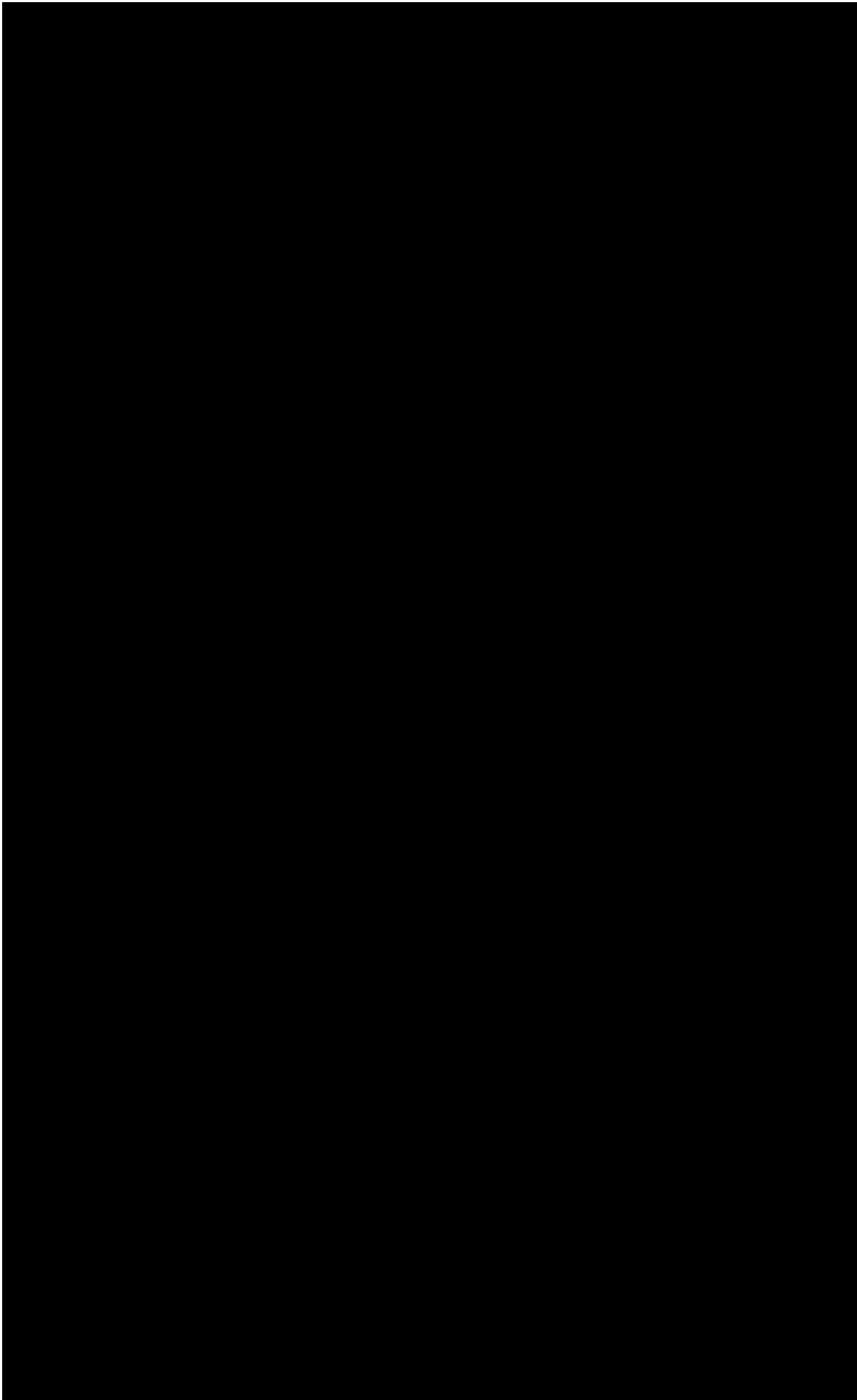
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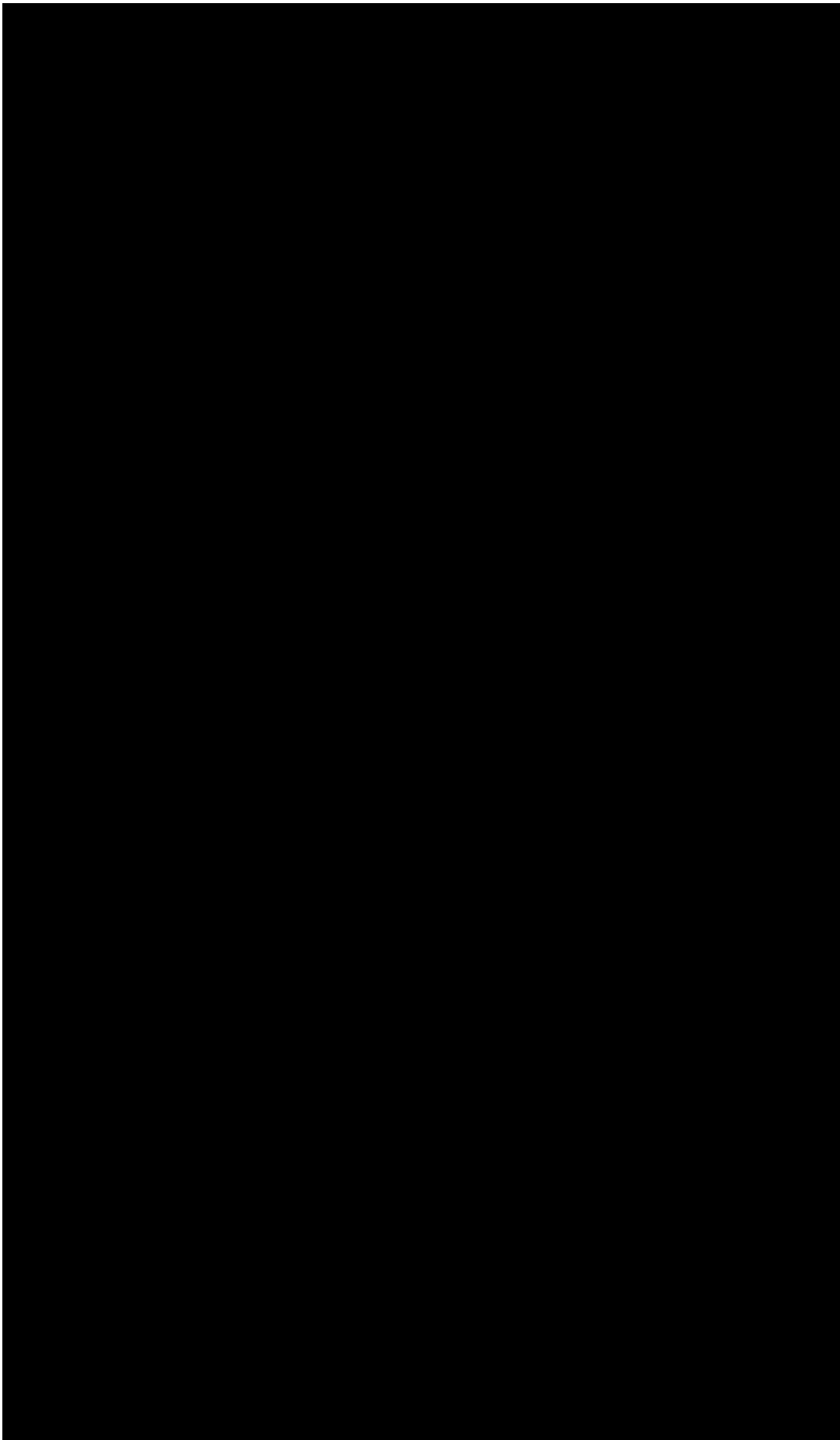
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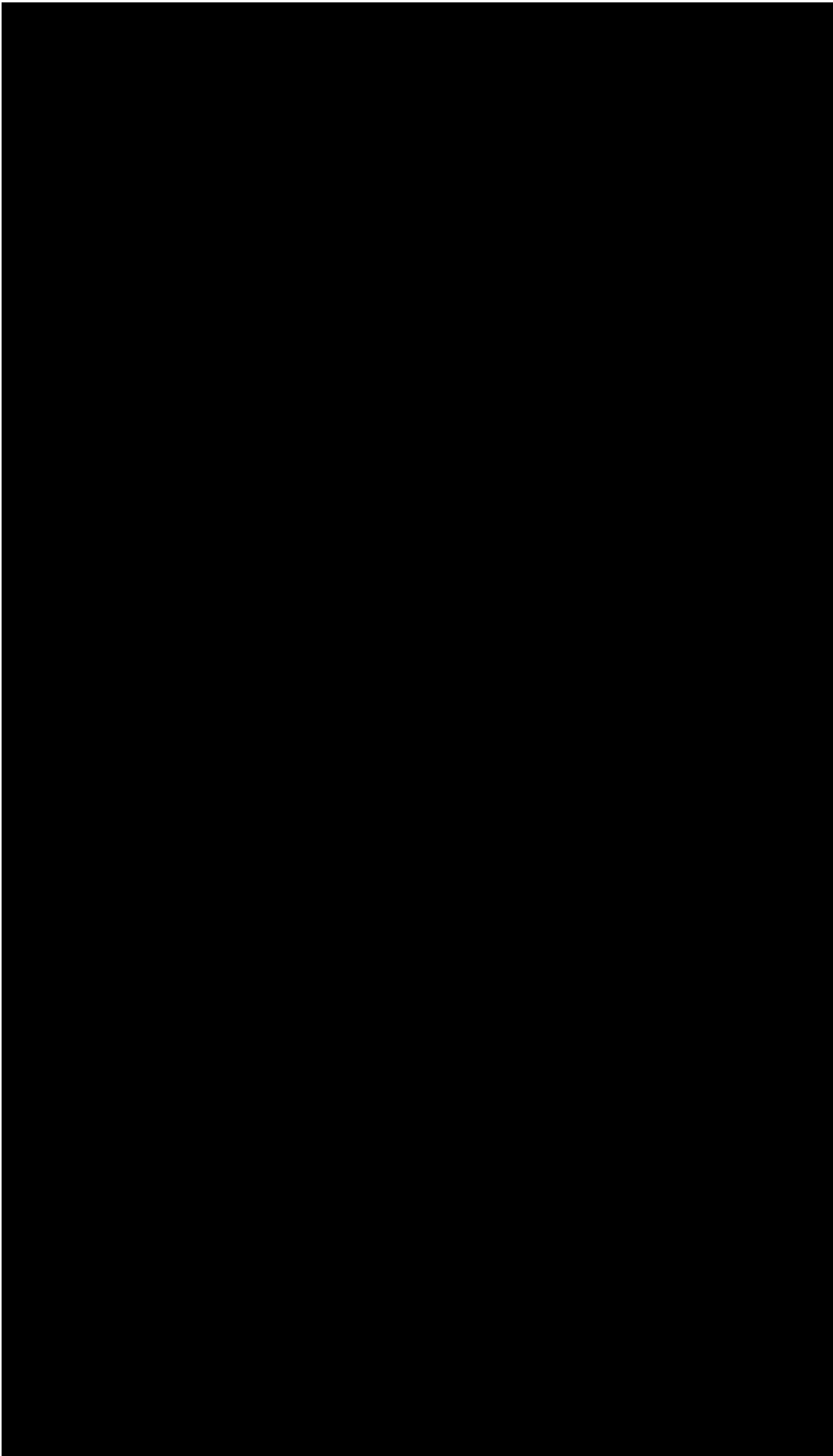
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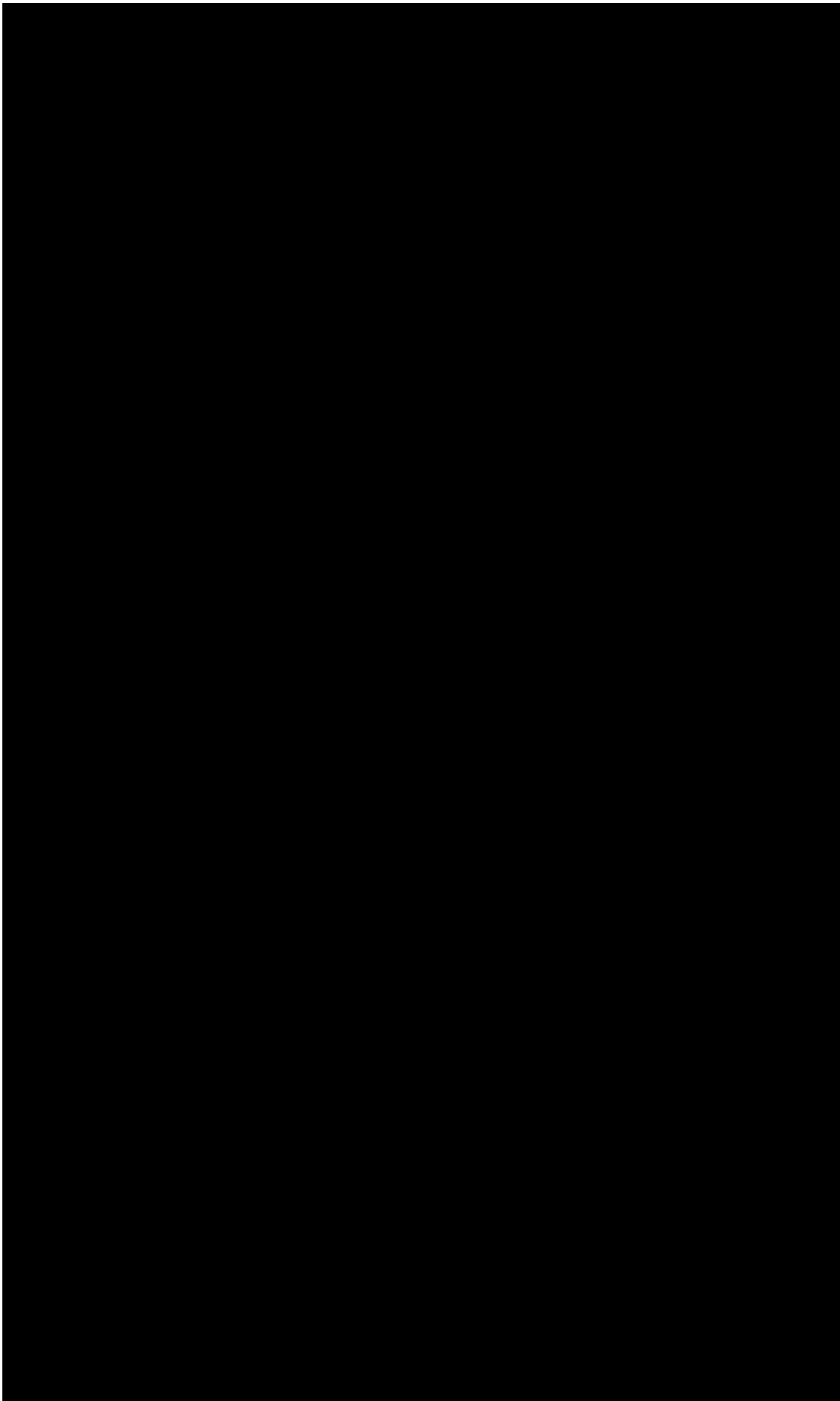
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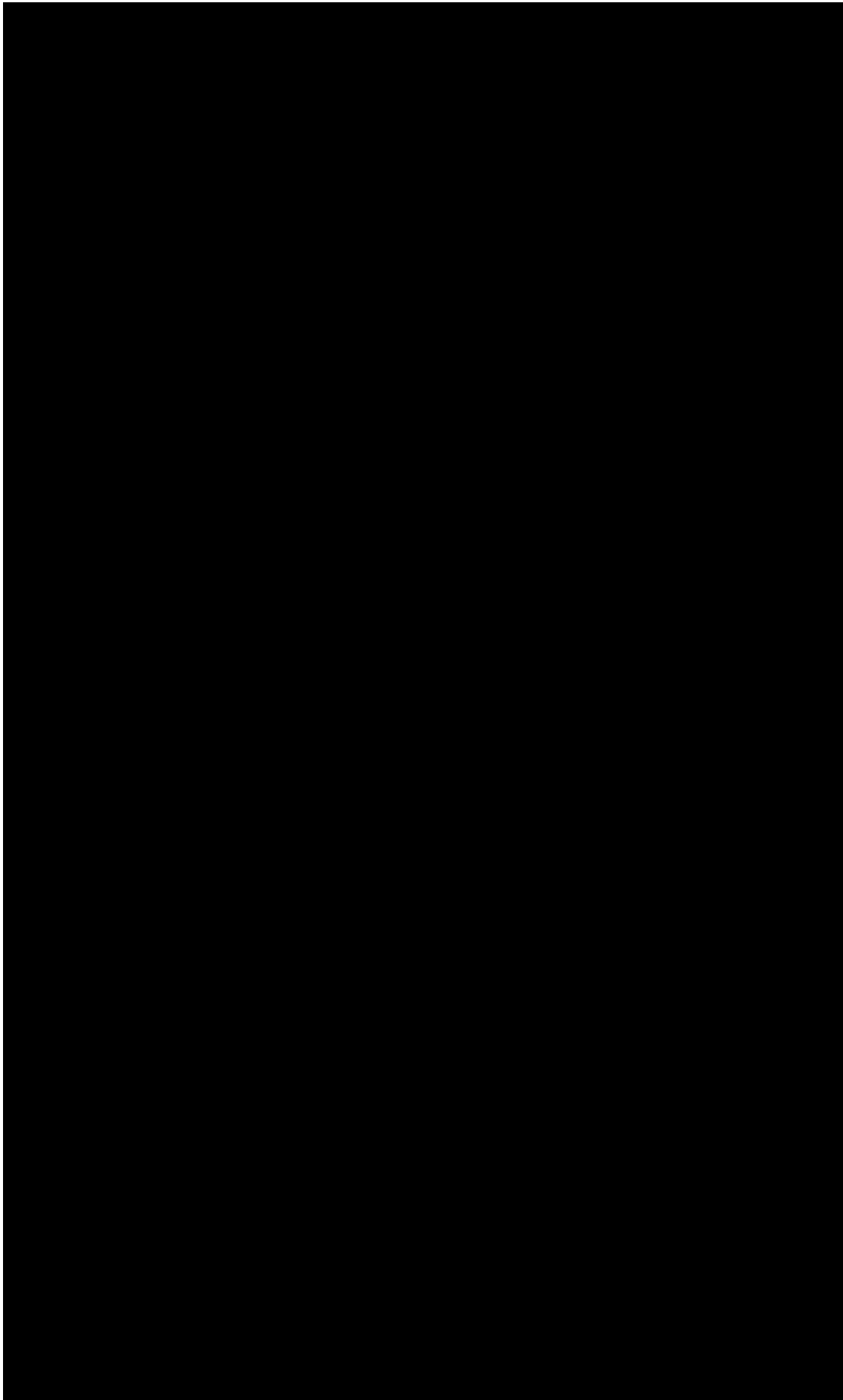
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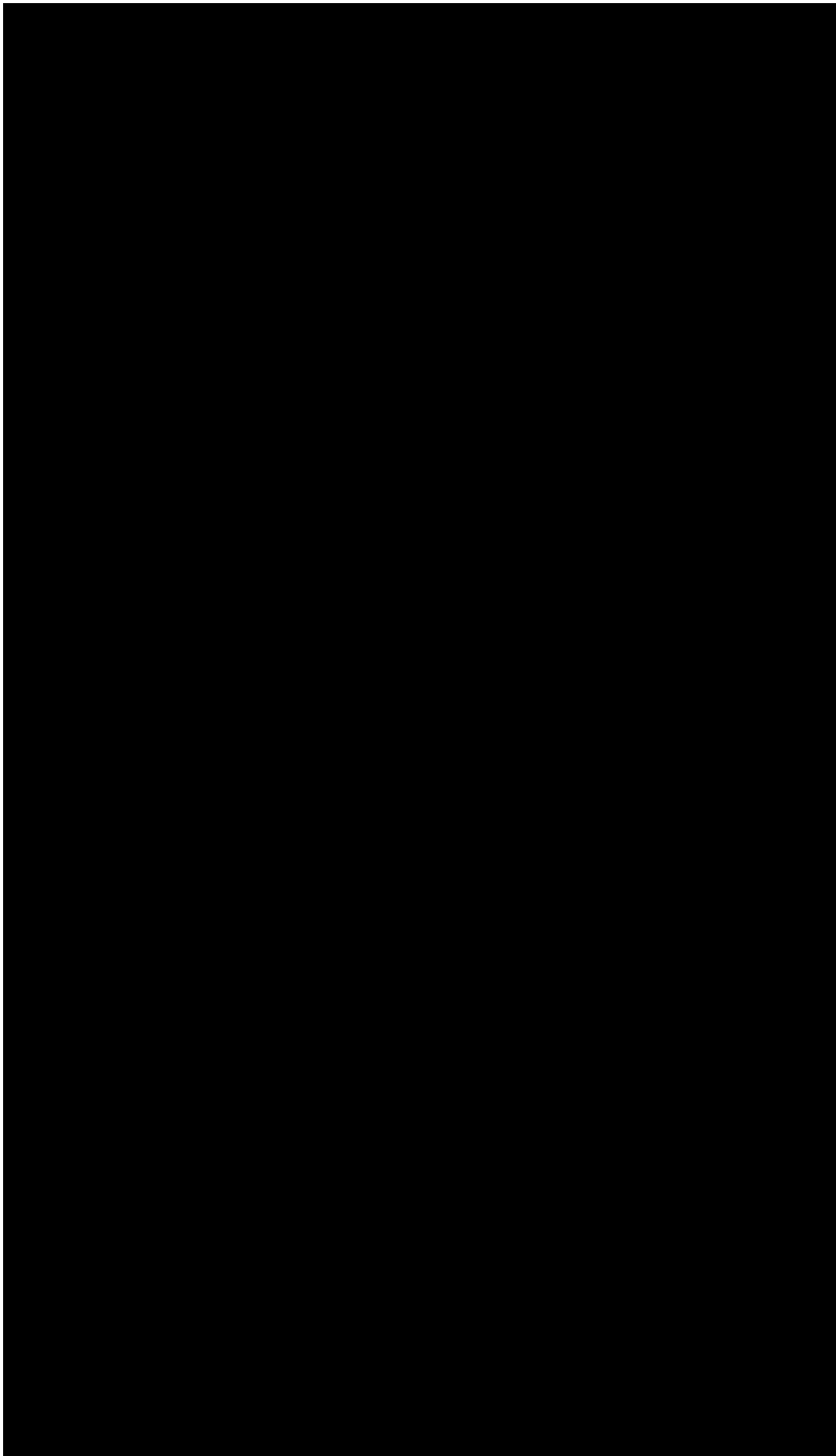
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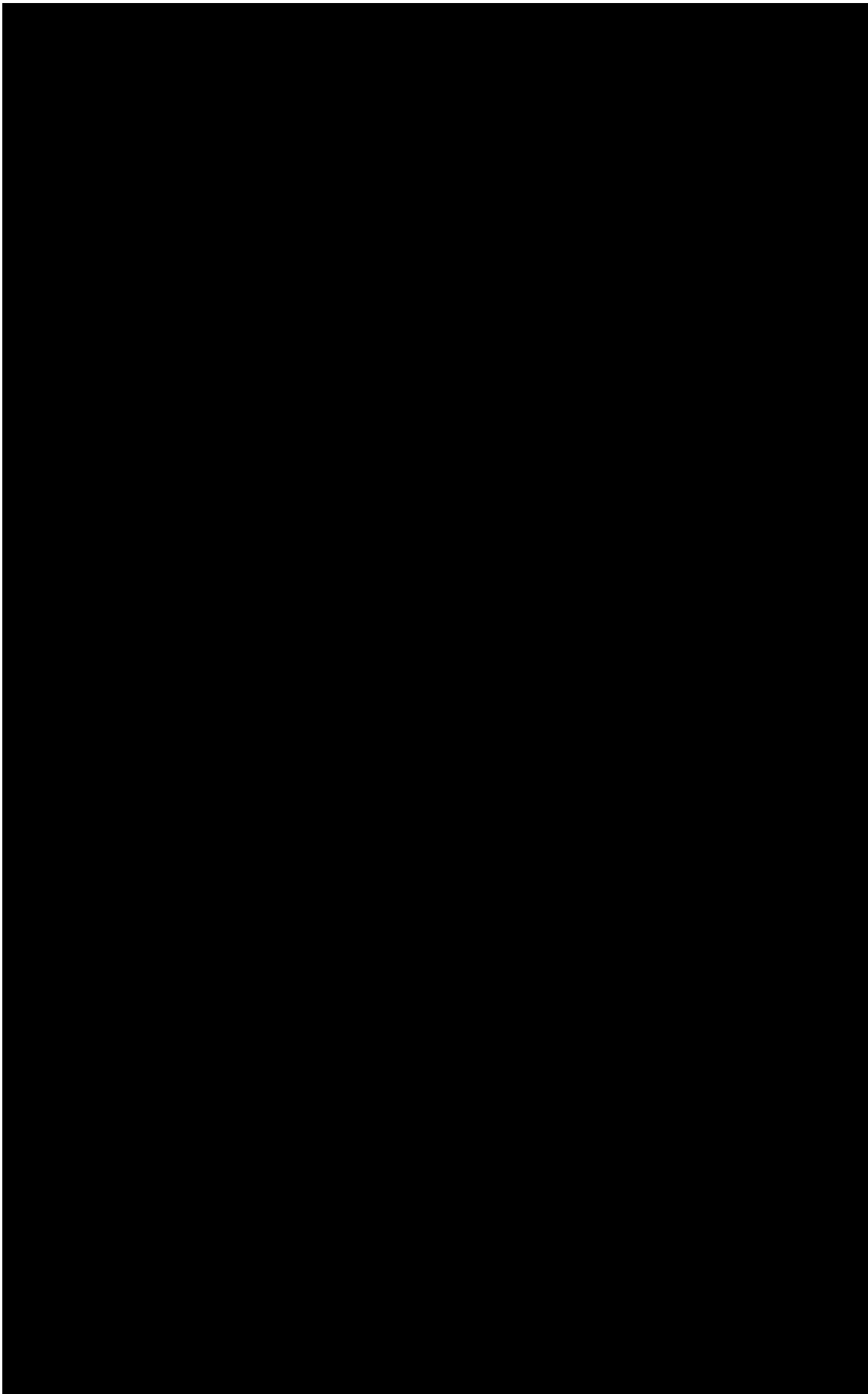
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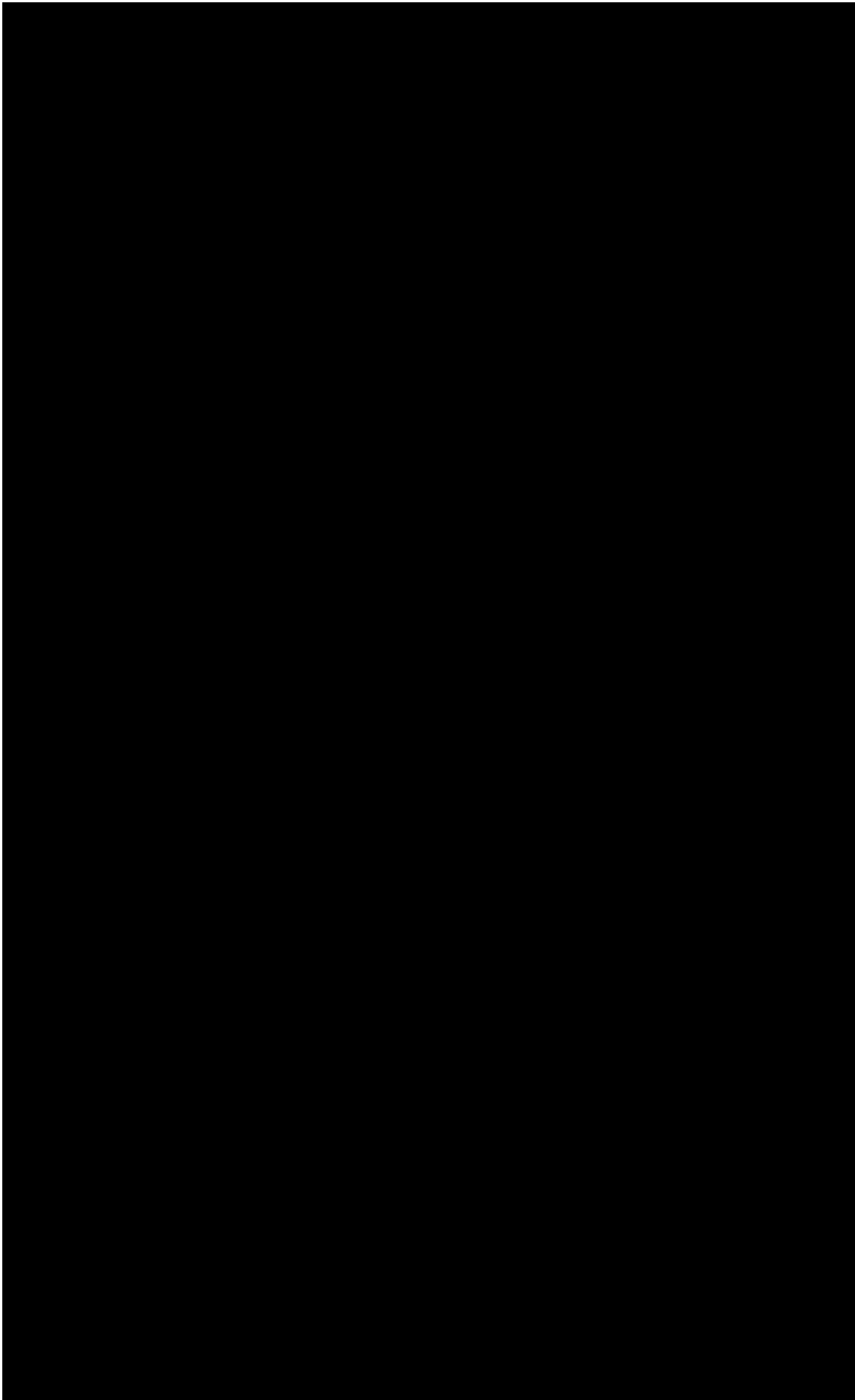
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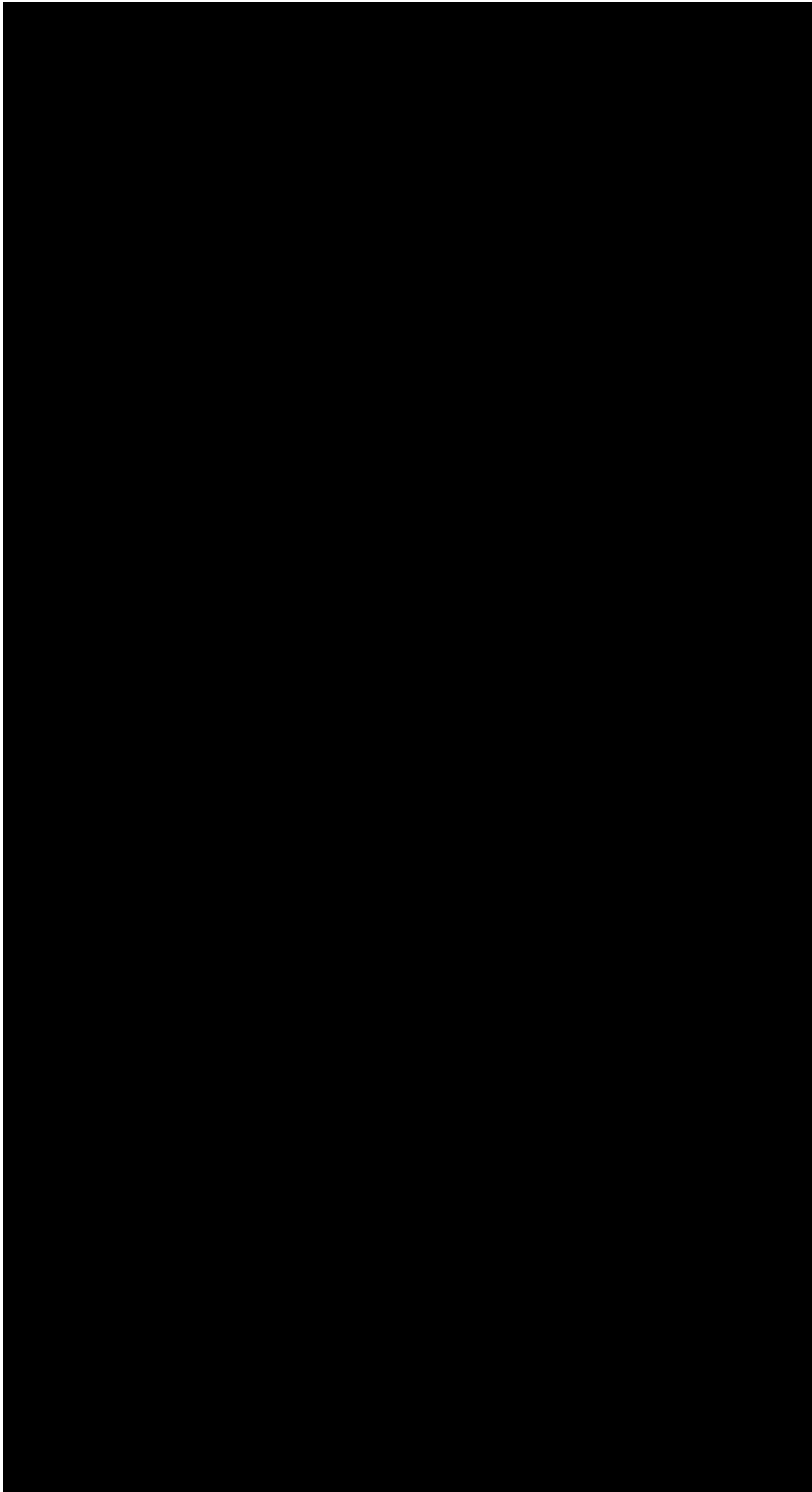
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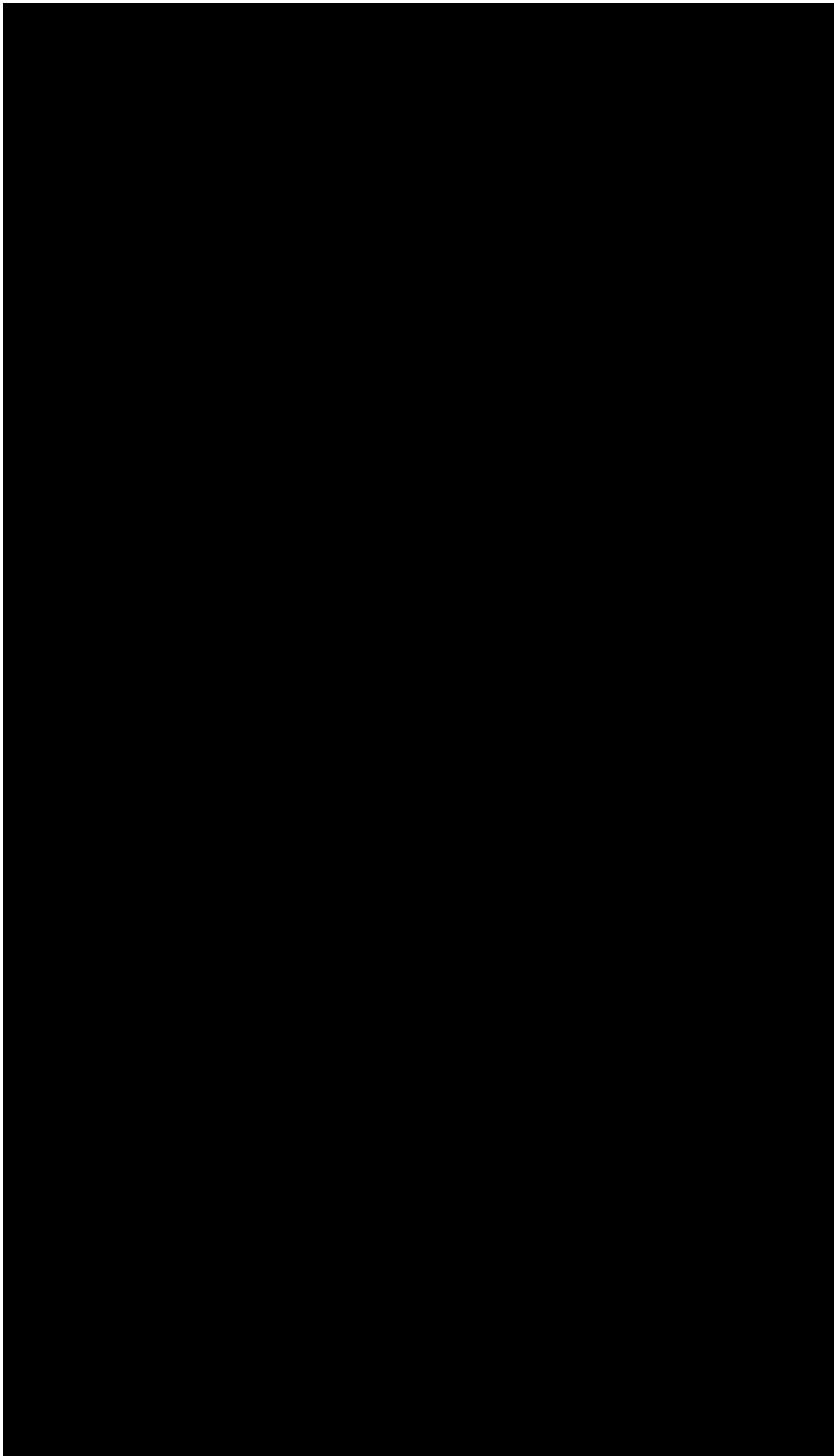
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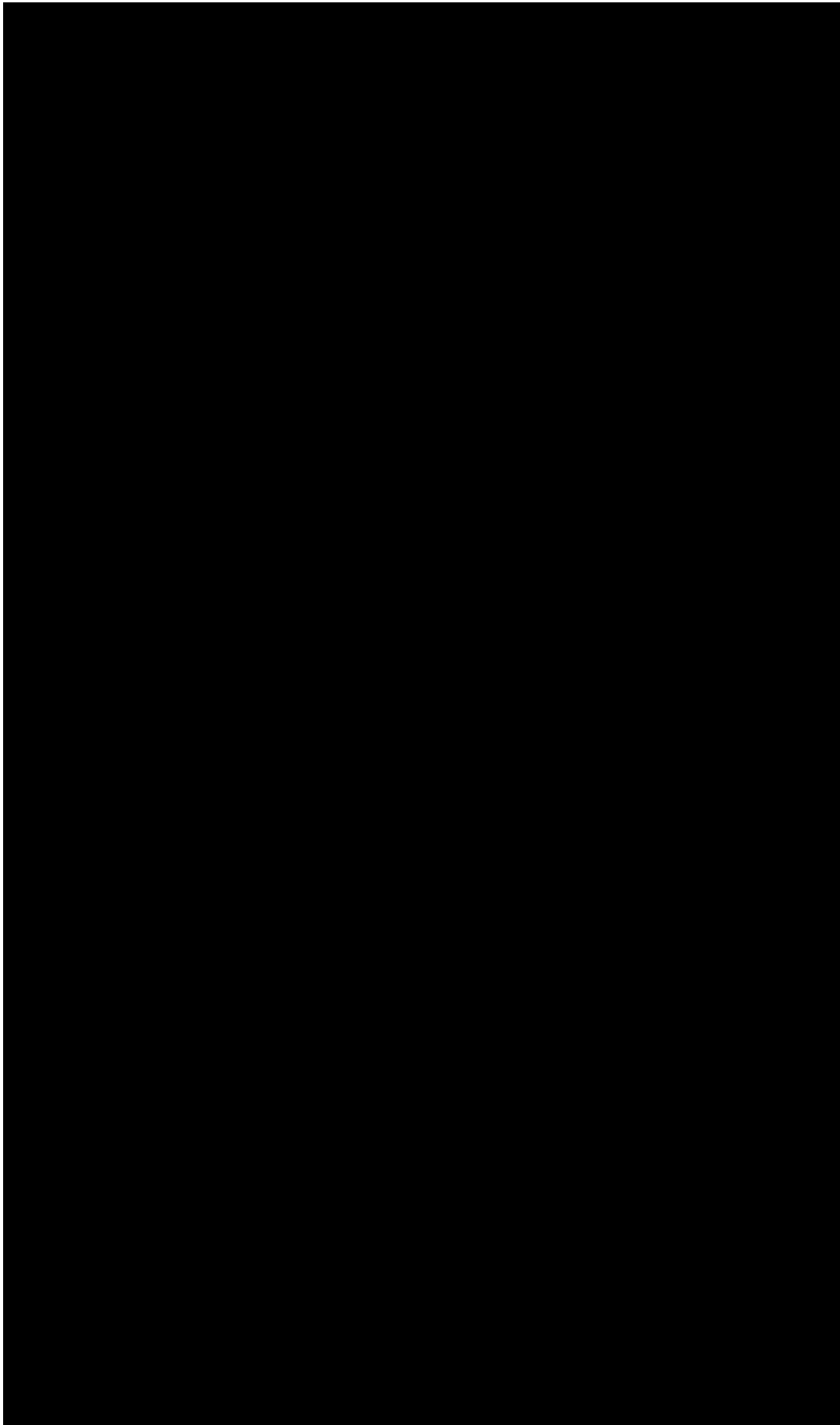
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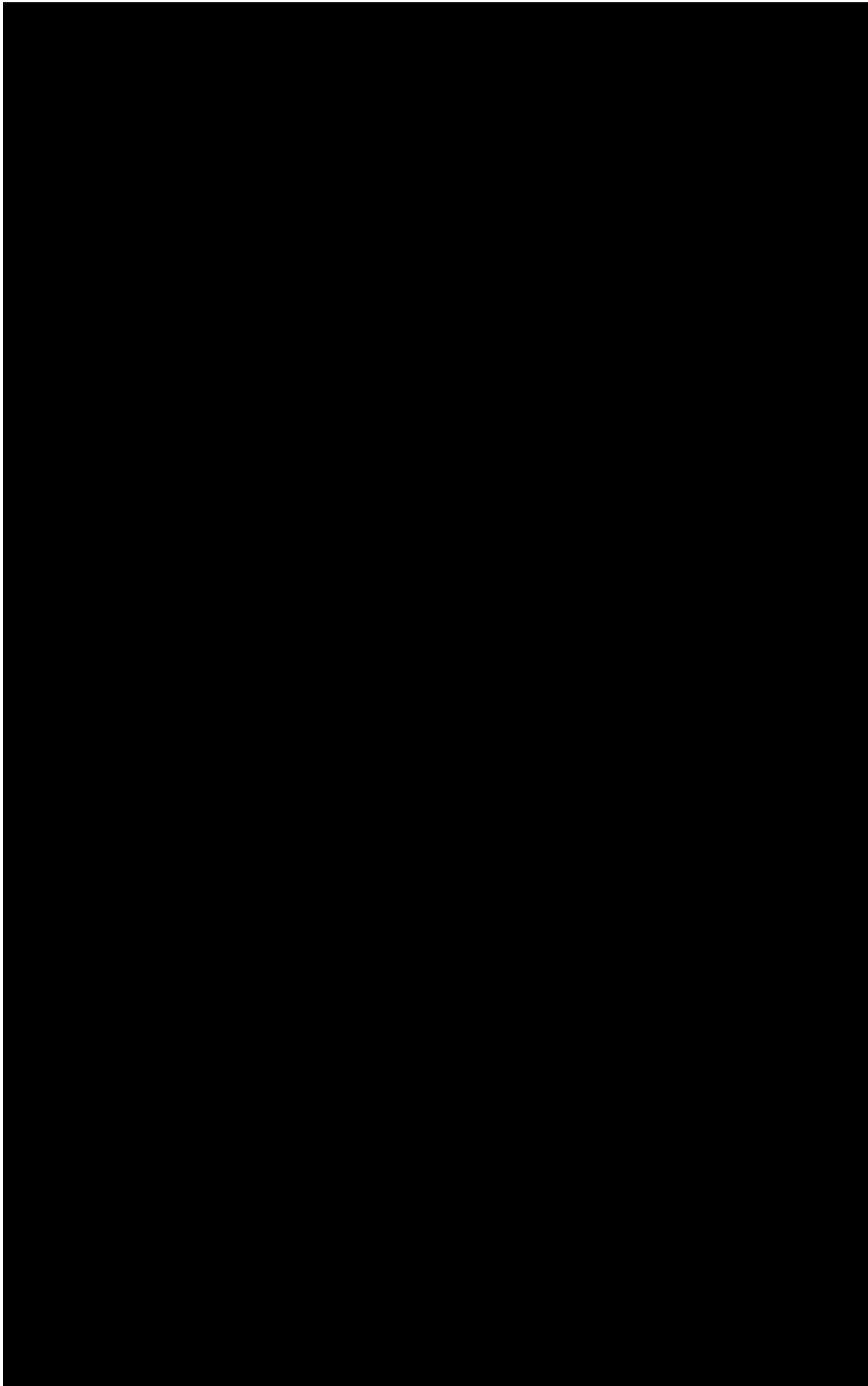
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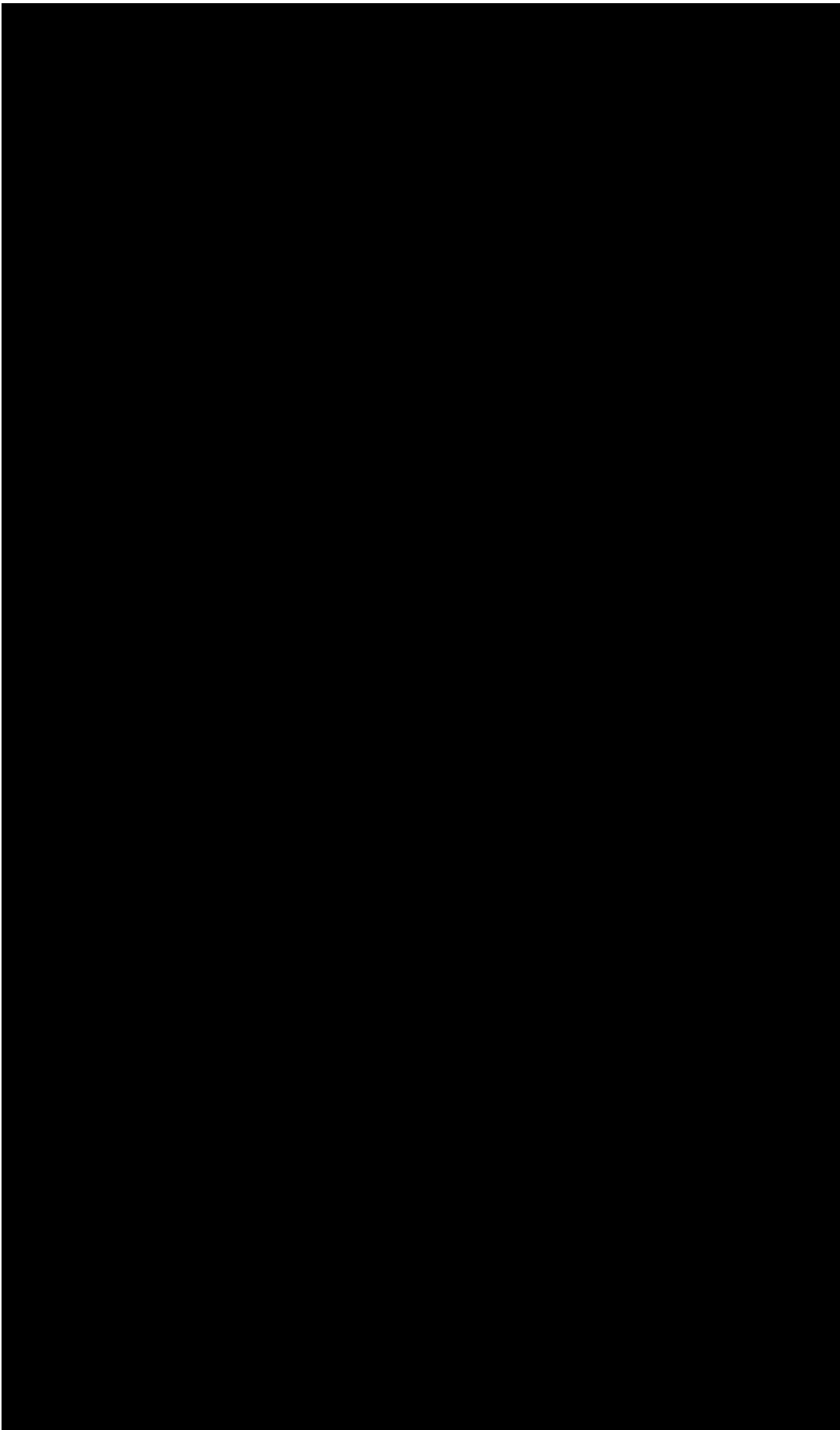
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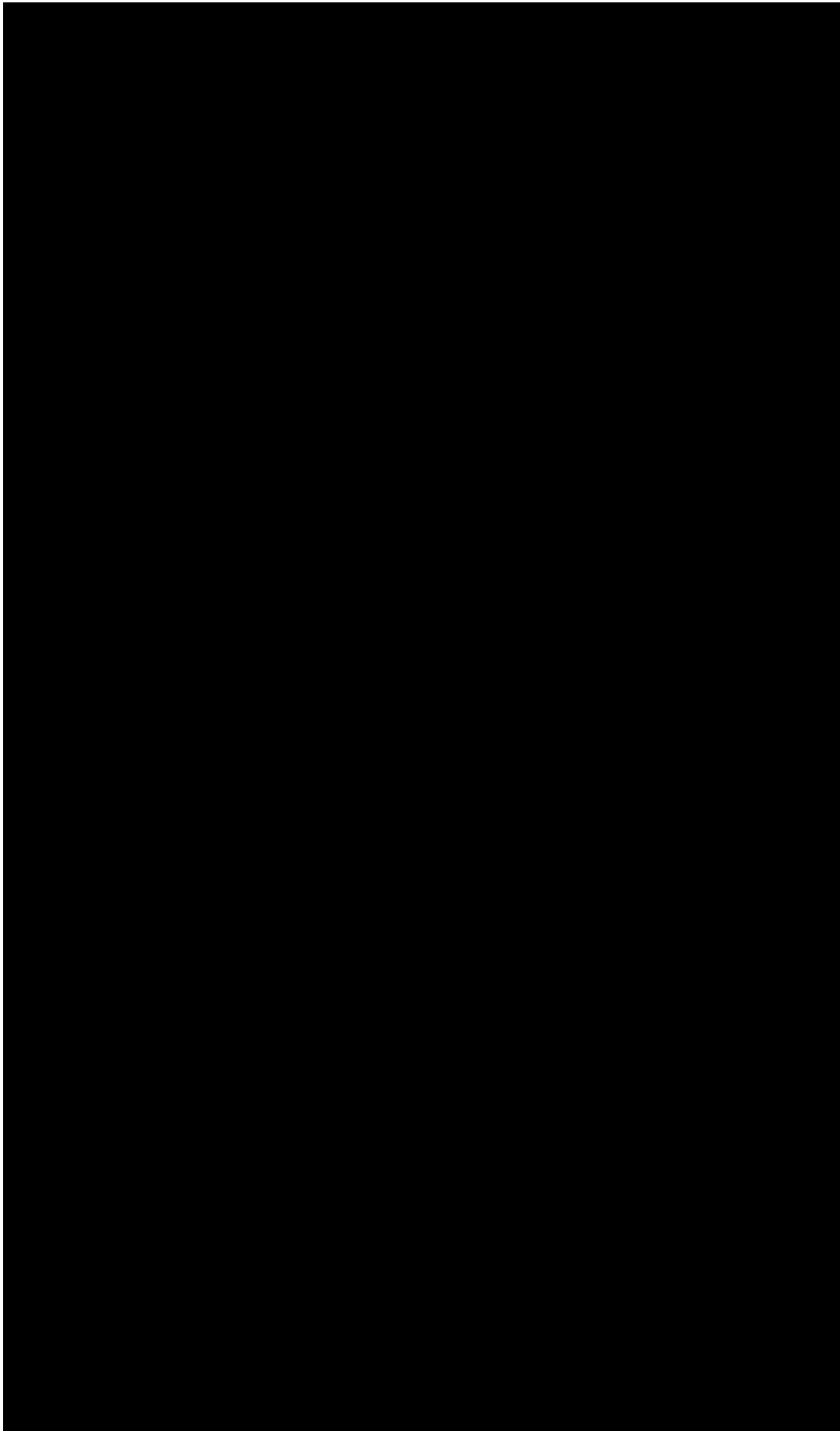
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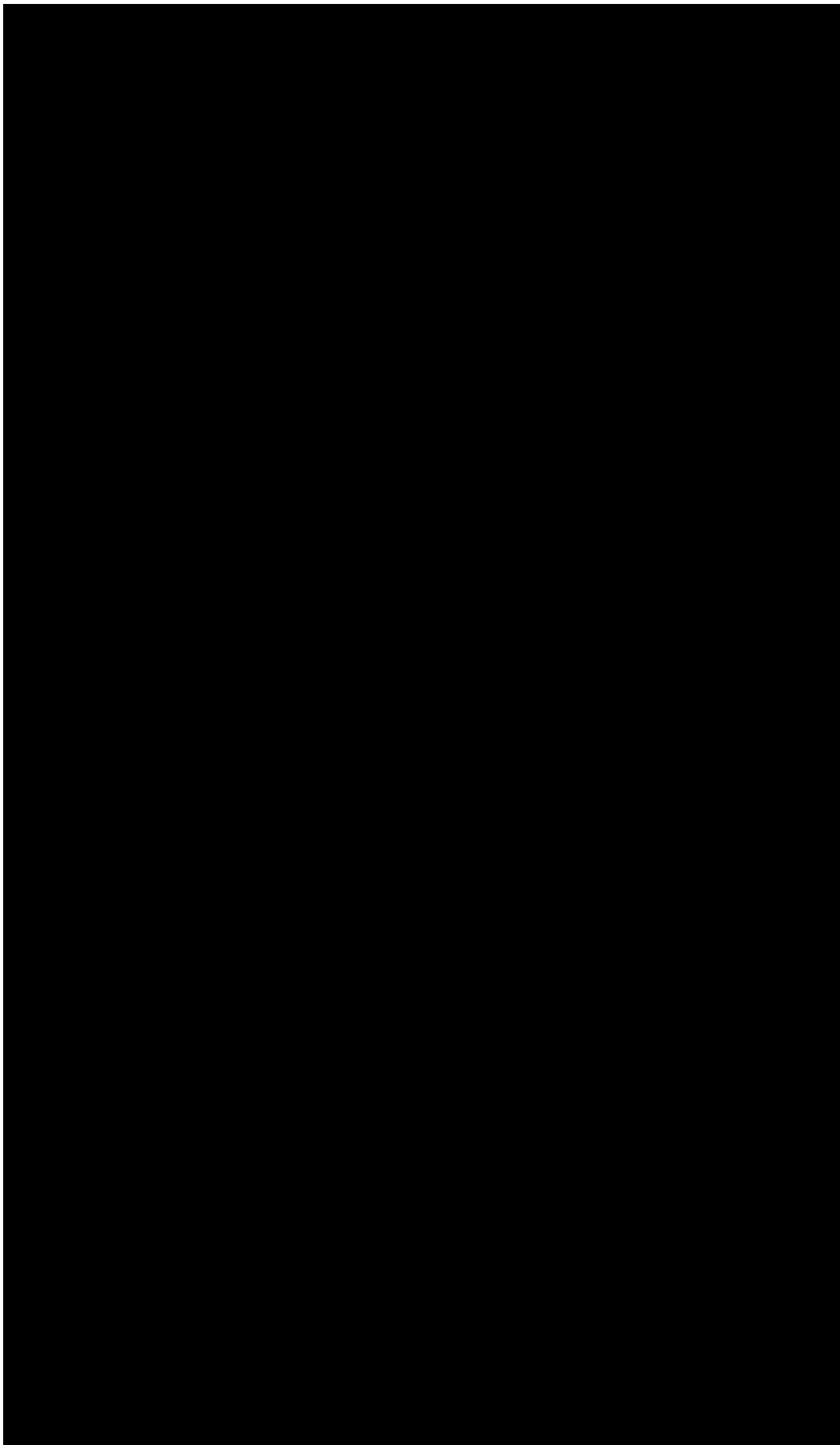
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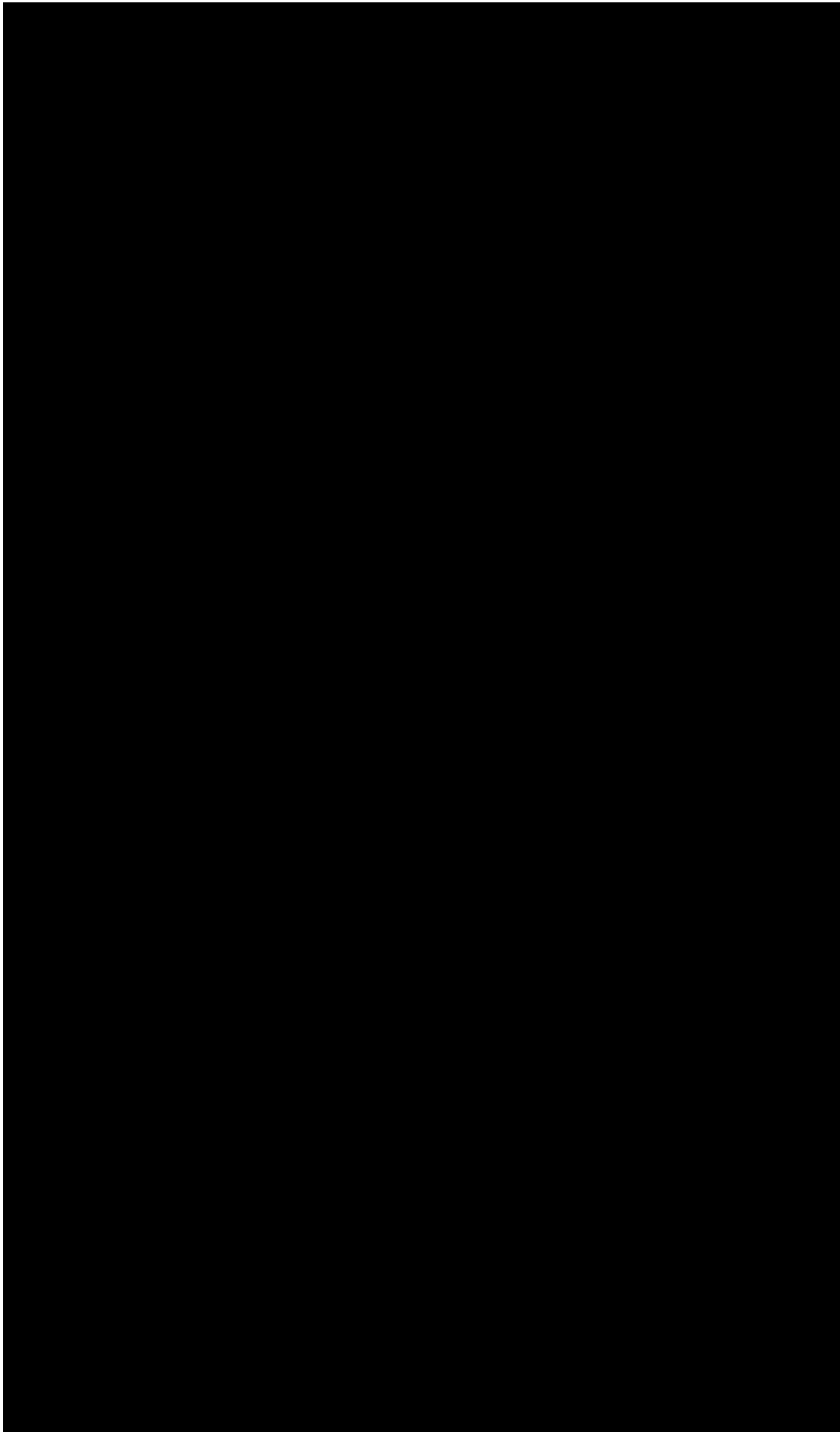
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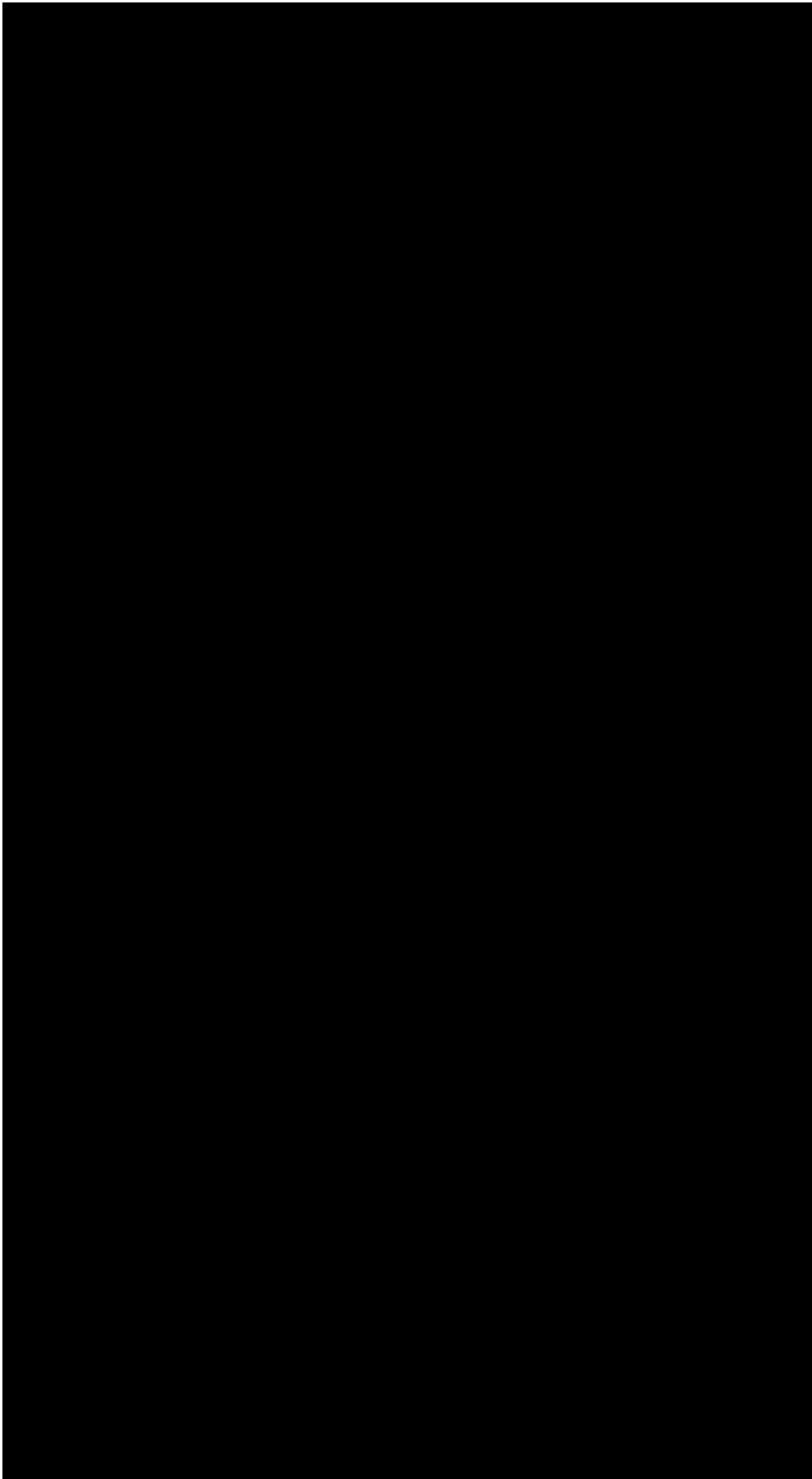
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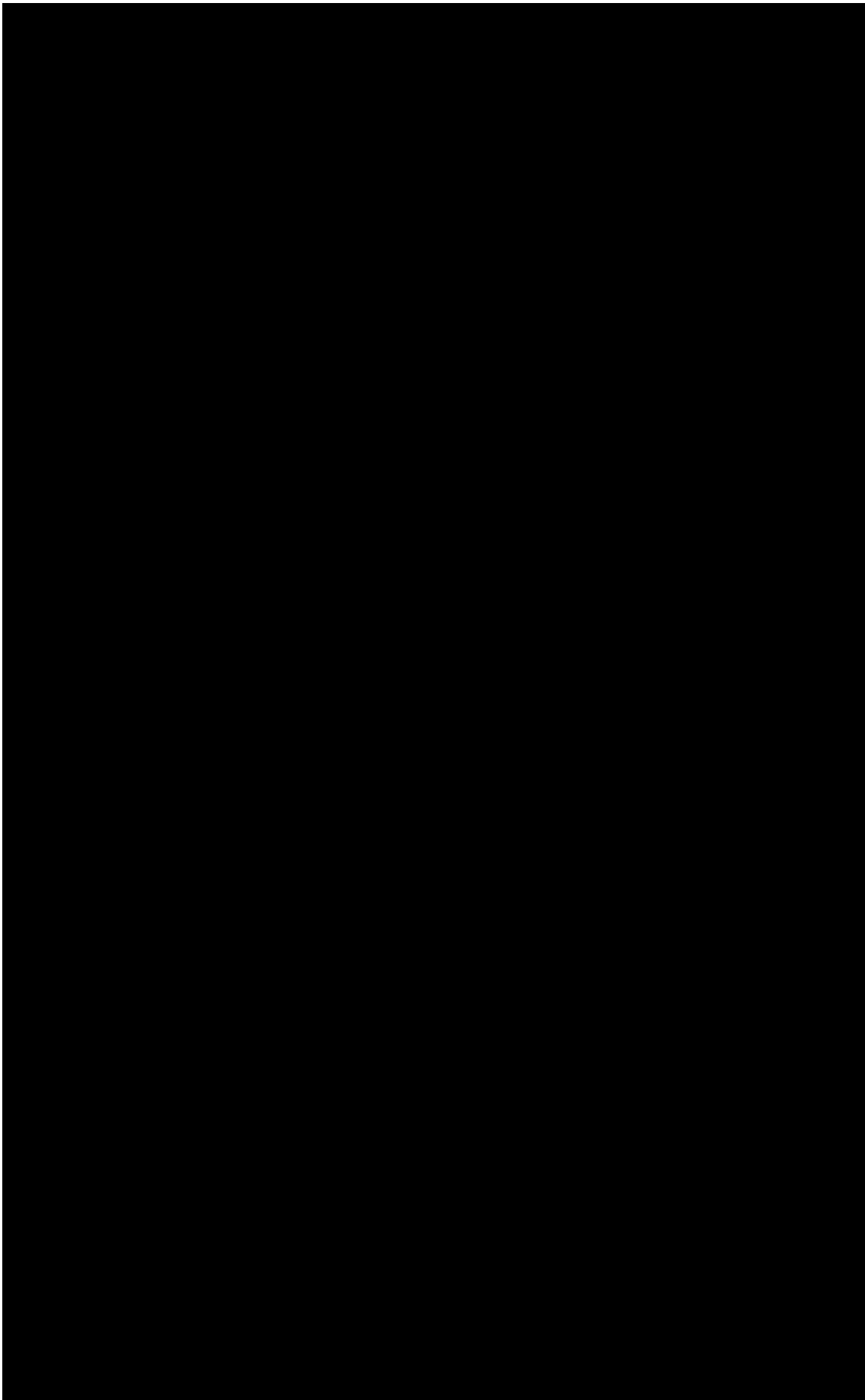
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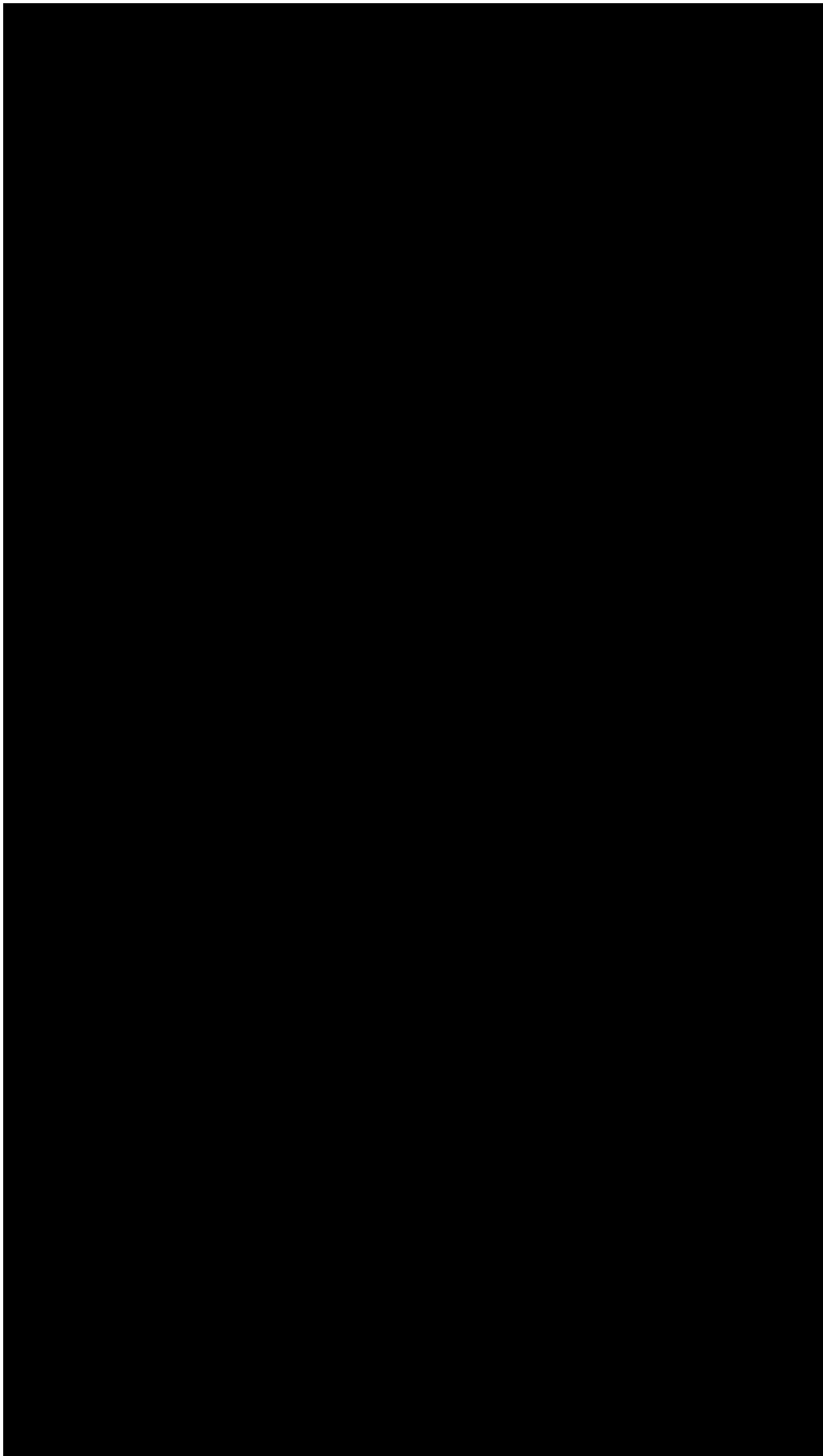
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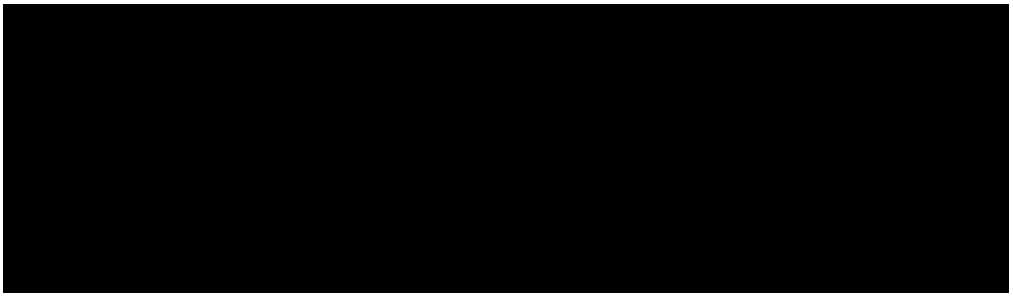
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Q. Going back to the recordings which are stored for those that did not opt into -- opt out of them being stored on the cloud, can those recordings be deleted by a user?

A. Can you repeat your question?

Q. Sure. I'm talking about a situation where a user has not opted out of their recordings being stored in the cloud. I'm wondering whether or not a customer user has the ability to delete that recording?

A. They do. Yes.

Q. Okay. Do they also have the ability to delete the text transcript which is produced?

A. Yes, they do.

Q. As far as voice recordings, how do they do that?

A. You can go into the Alexa app or the desktop browser and go to that section that we had previously spoken about called "voice history." Review voice history. And there you can see each of your transcripts and there's a little icon for

1 audio and there's a delete button. So they could
2 do it there.

3 And then there are other controls where we
4 talked about the retention policy where you can
5 also delete in bulk.

6 Q. If you deleted on your phone -- if a user
7 deletes it on their app, is it deleted from the
8 cloud?

9 A. Yes.

10 Q. And how does that process work?

11 A. I am not familiar. I'm not an engineer.

12 Q. How do you know if you delete it on your
13 phone it is also deleted from the cloud?

14 A. That is the policy that we have. The
15 mechanics of it sits in a different team.

16 Q. Is there a specific policy that you're
17 referring to?

18 A. The retention -- I guess you could call it
19 the retention policy or the deletion policy.

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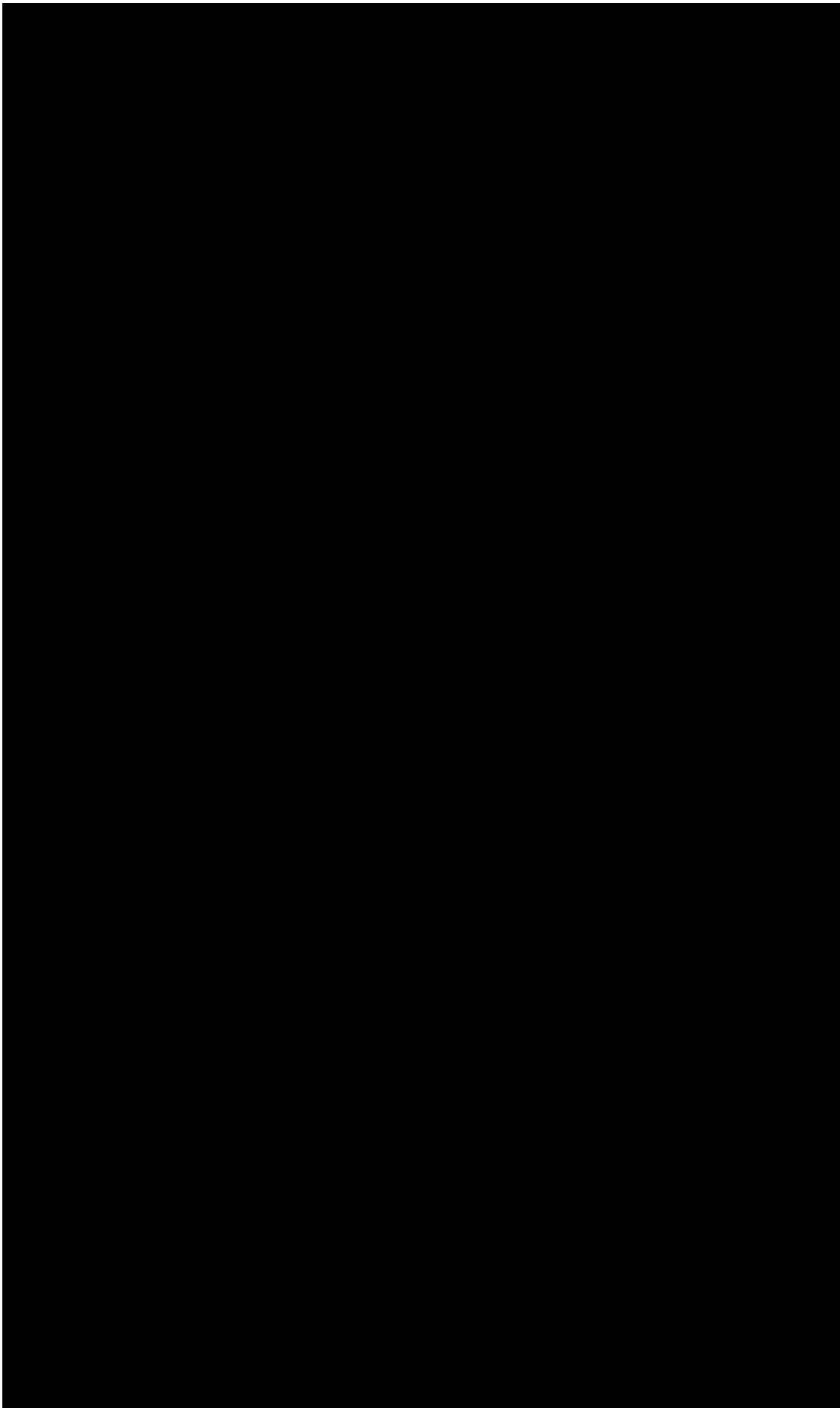
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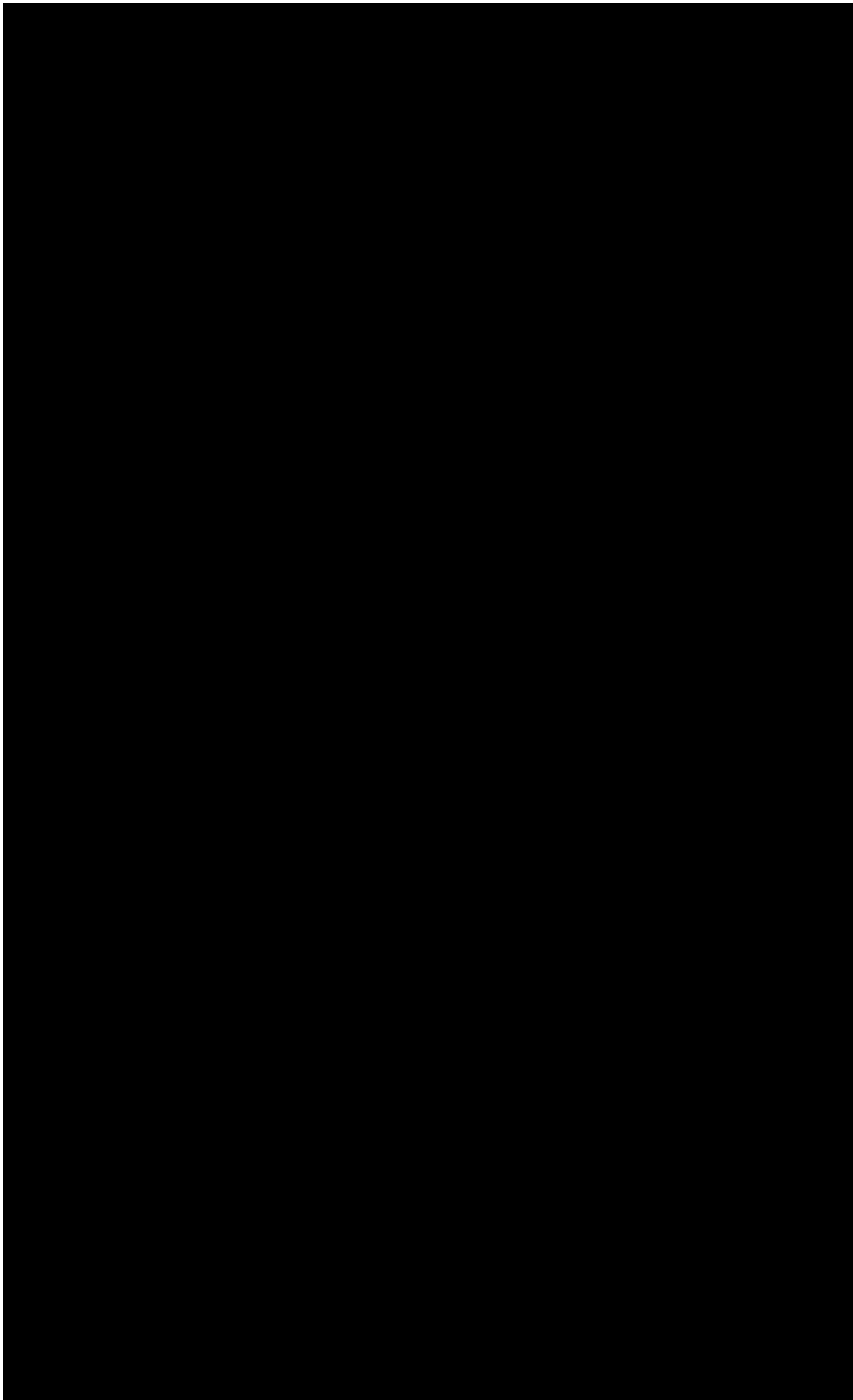
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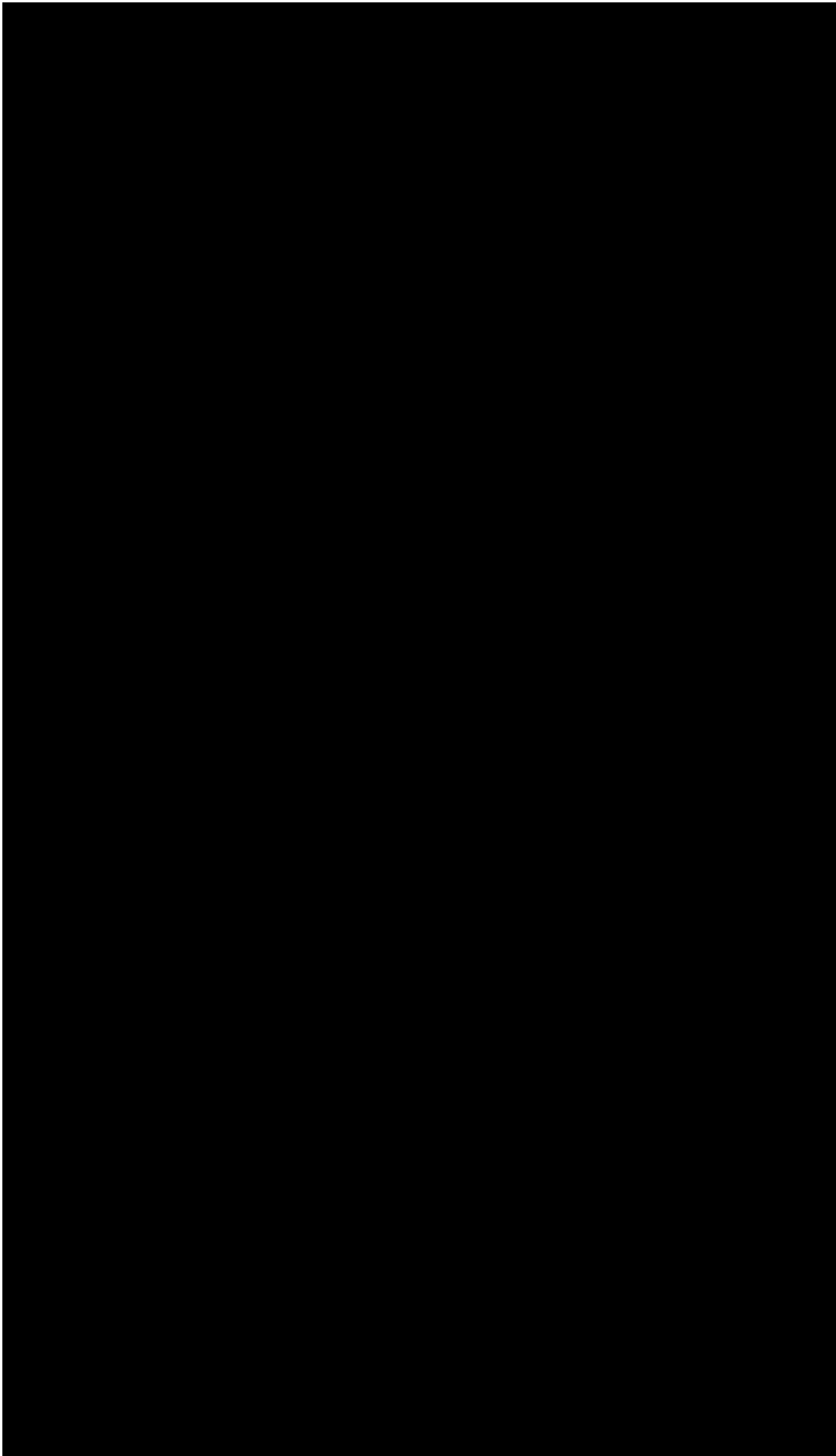
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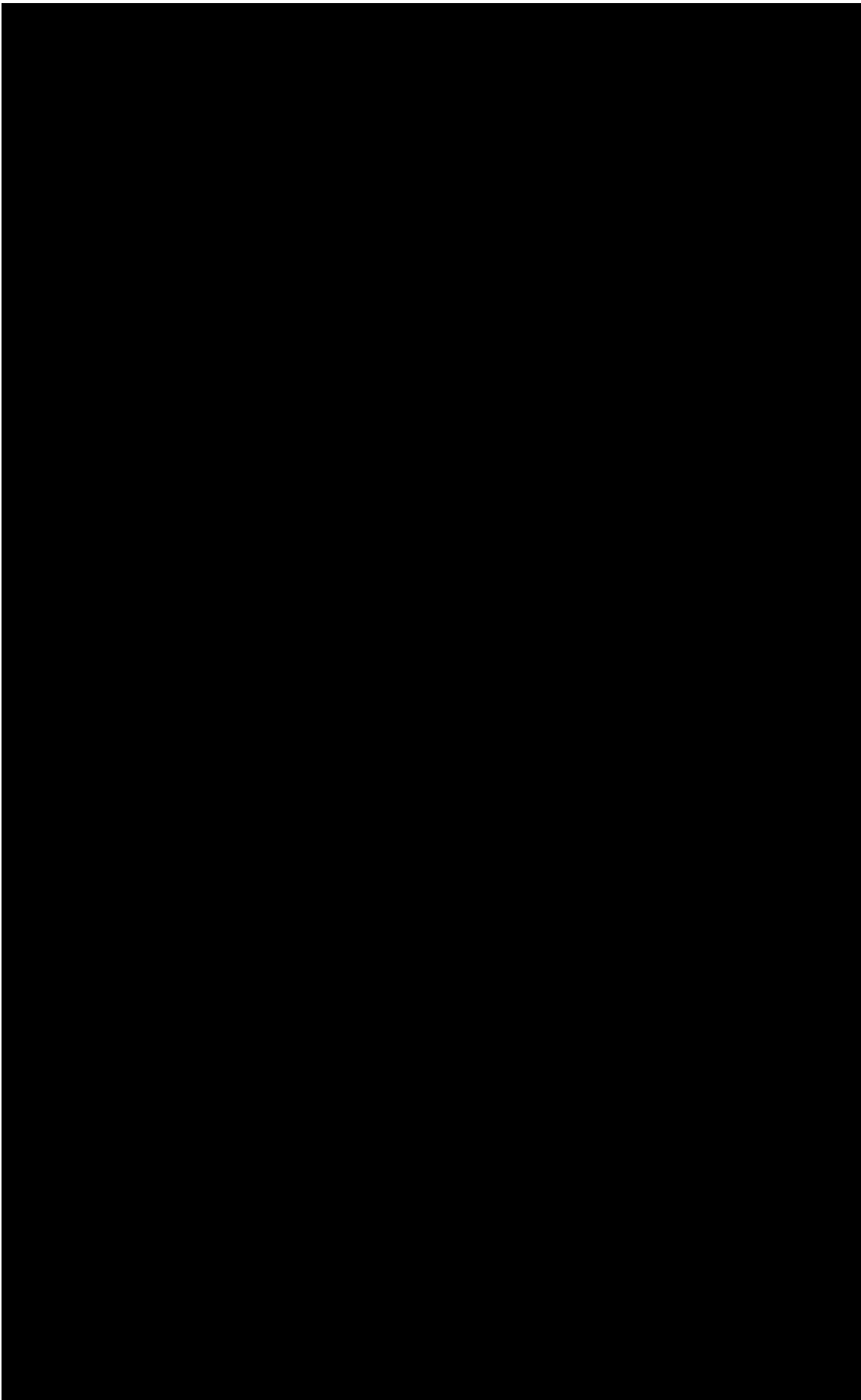
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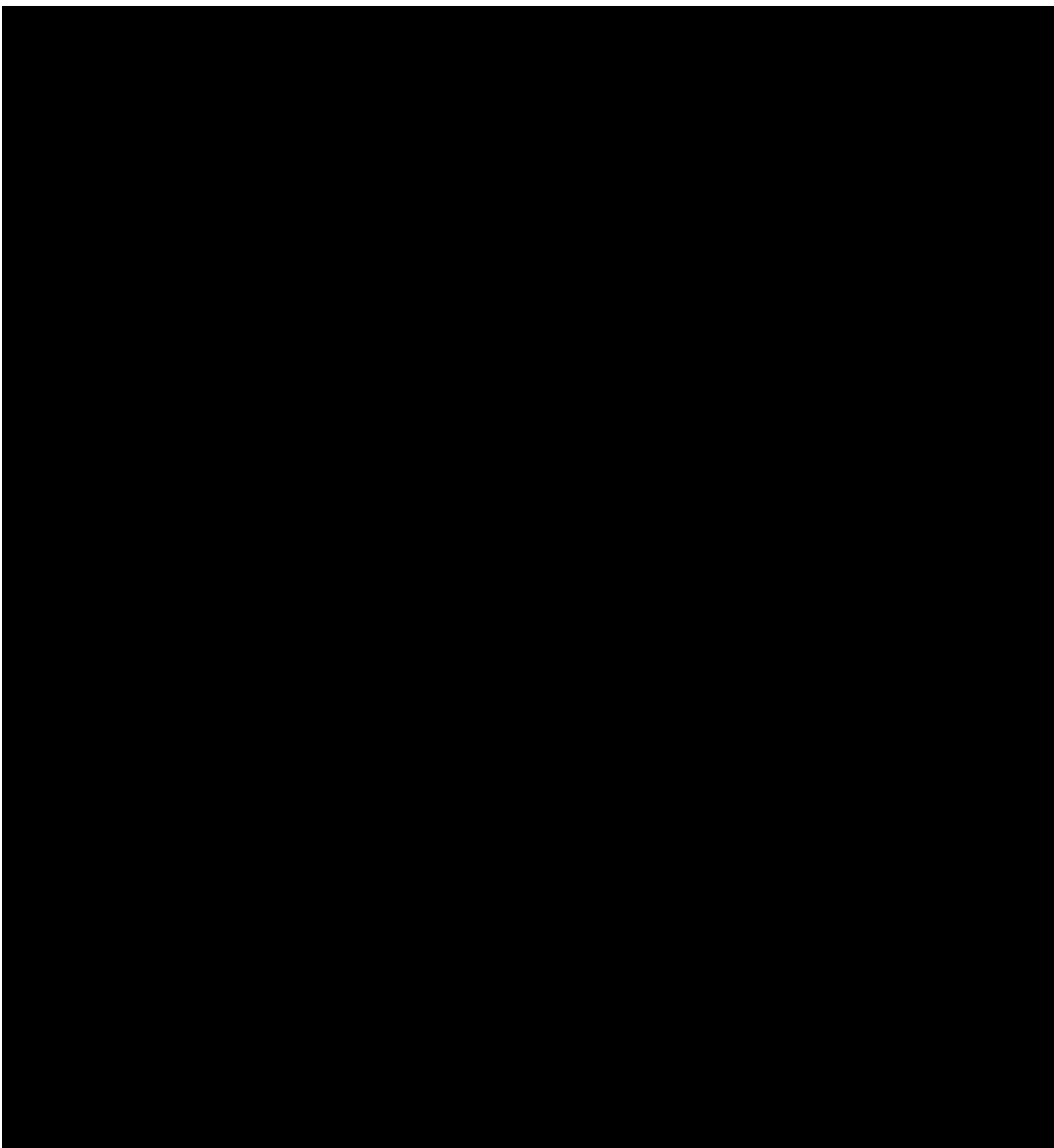
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Q. Is Alexa, the Echo family of devices, is
it always listening?

A. It is not always listening.

Q. Is it continuously processing audio?

MR. NEWBY: Objection to form.

A. I think the wake word team would be more
suited to get to those details.

Q. How do you know it's not always listening?

A. So as the speech recognition component, we

1 not have that descriptor. But again, I am not on
2 the AED team and I am not a scientist. I did not
3 write this. So I would defer to them for more
4 specifics.

5 Q. Do you know if Amazon launched the DNSVR
6 feature without any public relations or press
7 releases?

8 A. The DNSVR, "Do not send voice recordings"
9 feature was announced at the fall event, which
10 internally we consider one of our biggest PR,
11 public relations events.

12 Q. And what time of year was that?

13 A. In the fall. September.

14 Q. What year? Do you know?

15 A. September 2021.

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Q. So is it still your opinion that there was PR for DNSVR?

A. Yeah. So the PR happened in the fall of the preceding year. It's actually pretty common for us because we do have the standing event annually where we talk about new features and announcements.

And typically our PR team would not want to repeat using more PR in the subsequent months or in the subsequent following months.

And so what this means is that when we finally launched the feature in Q1, we didn't have any PR. But that PR was done in the fall.

Q. And I might have asked you this, but what is your understanding or definition of a "wake word"?

A. It's a word that is used to invoke Alexa.

Q. And what is utterance audio?

A. Utterance -- I think we had talked about an utterance can be audio or text. Utterance audio is the actual audio recording of the voice

1 Alexa to recognize their voice. Is that right?

2 A. Yes, that's correct.

3 MR. DEARMAN: Objection, form.

4 MR. NEWBY: Sorry. Was there an
5 objection?

6 MR. DEARMAN: There was, to form.

7 Q. Ms. Sun, is the voice ID feature, is that
8 limited to registered users of Alexa?

9 A. It is not. No.

10 Q. Can anyone create a voice ID?

11 A. Yes.

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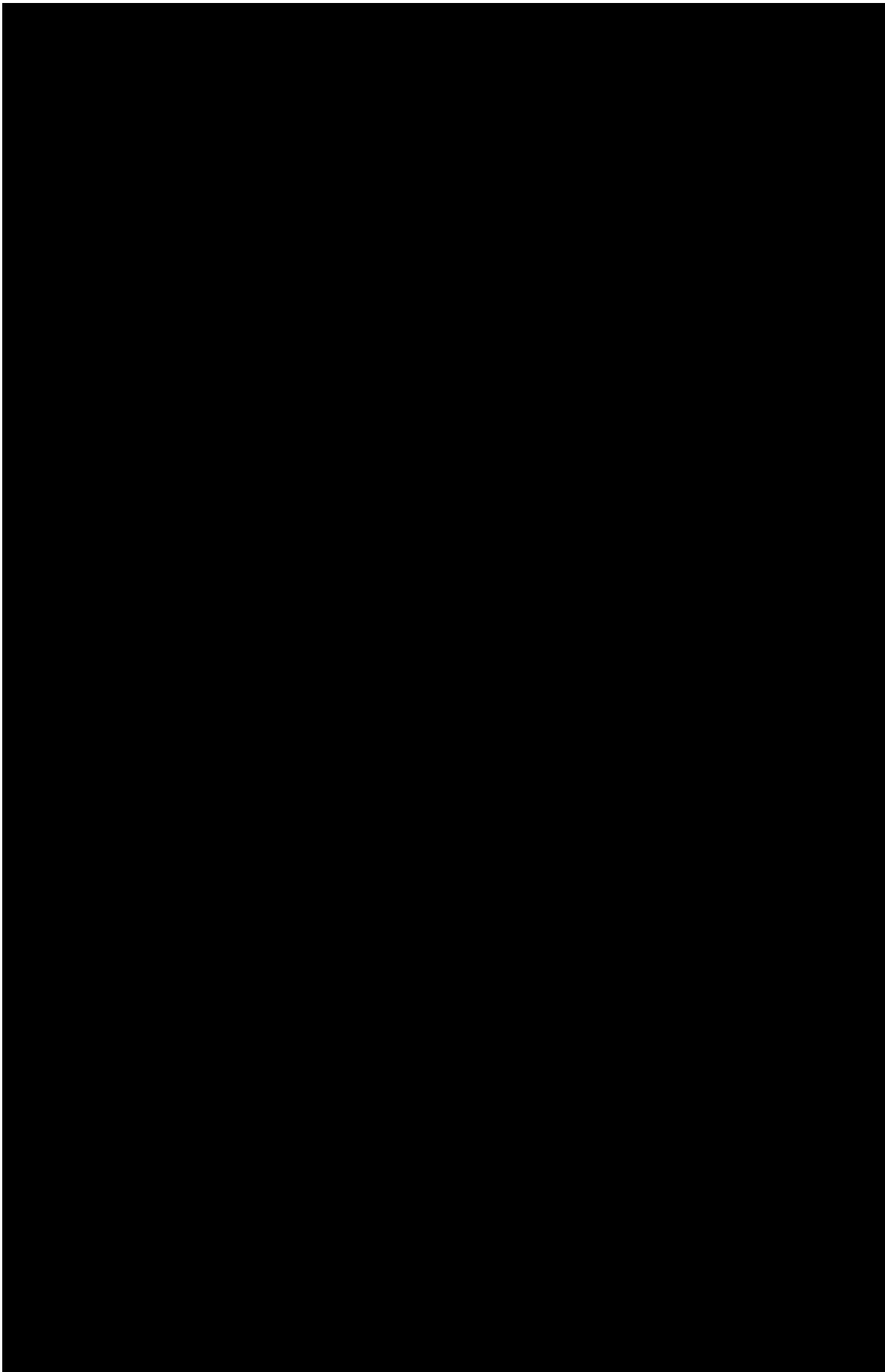
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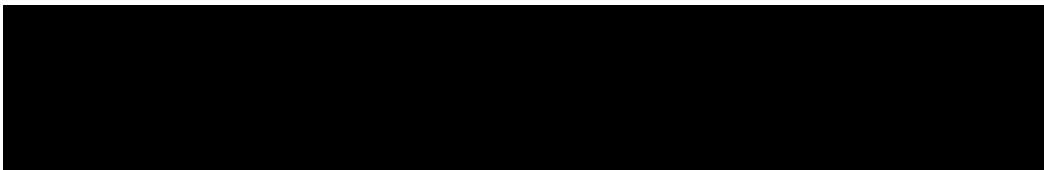
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MR. NEWBY: I have no further questions.

MR. DEARMAN: We have no further questions.

THE VIDEOGRAPHER: All right. Anything further for the record before I take us off for the day?

MR. DEARMAN: No.

Thank you, Angela, for your time.

THE WITNESS: Thank you.

THE VIDEOGRAPHER: All right. In that case, we are going off the record. The time is 21:48 UTC. And this concludes today's testimony given by Angela Sun.

(Off the record at 21:48)